
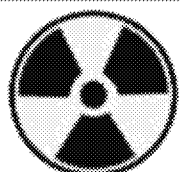


## Dewey Burdock Public Comments

Stating opposition with no other comments:



**NO URANIUM IN TREATY TERRITORY**



Protect these most pristine Aquifers in the world, OUR HOME IN UNCI MAKA - THE BLACK HILLS AQUIFERS

**SAY NO TO THE DEWEY BURDOCK URANIUM AQUIFER MINING**

4 WAYS TO SUBMIT PUBLIC COMMENT: ENDS MAY 19.

1. MAIL: U.S. EPA Region 8 Mail Code: 800P-010 1500 Wynkoop Street Denver, Colorado 80202-1120	2. EMAIL: <a href="mailto:valerie.valentin@epa.gov">valerie.valentin@epa.gov</a>	3. FAX: 303-312-6741	4. SUBMIT WRITING TO ANY OF THE HEARINGS
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**(4) EPA PUBLIC COMMENT HEARINGS**

APRIL 27 @ 4-530 PM NIERRARA LODGE in VALENTINE NE  
-2 PM RALLY & FEED

MAY 8- 9 @ 1-3 PM RAMKOTA in MNILUZAHAN RAPID CITY SD  
- 11 AM PRAYER WALK, RALLY & FEED @ MOTHER BUTLER





MAY 10 1-3 PM MUELLER CENTER in MNIKATA/HOT SPRINGS SD  
-MARCH RALLY FEED TBA

MAY 11 1-3pm ST JAMES CHURCH EDMONT SD  
-MARCH RALLY FEED TBA

57 PASSENGER CARAVAN FROM PINE RIDGE TO RAPID CITY EACH DAY OF HEARING IS AVAILABLE.  
7am Depart -9am Return at Billy Mills Hall Pine Ridge, SD

PLEASE COME JOIN US MITAKYEPI

Contact: (605)415-0115  
Look for us on FB for any updates

 4  98  85 

Pls stop. Thanks. [Ex. 6 Personal Privacy \(PP\)](#)

Stop drilling. Stop Trump. [Ex. 6 Personal Privacy \(PP\)](#)

The Hong Kong/China based uranium mining company, Powertech/Azarga that has been pursuing ISL (in situ leach recovery) mining permits in the Dewey-Burdock, Edgemont area of the Black Hills, is currently requesting permits from the EPA for waivers from the Clean Water Act for the Inyan Kara aquifer in order to implement UIC injection wells for mining, and for hazardous waste permanent deposition from mining activity in the Minnelusa aquifer. Please DON'T

[Ex. 6 Personal Privacy \(PP\)](#)

Please do not give permission to drill in nation parks. This is a no brainer! Don't allow dumping uranium waste in an aquifer. [Ex. 6 Personal Privacy \(PP\)](#)

please enter my formal comments as NO! I do not think it's ok for mining waste to be injected into underground aquifer's. [Ex. 6 Personal Privacy (PP)]

Please do not permit injection of uranium recovery waste. [Ex. 6 Personal Privacy (PP)]

Absolutely NO uranium mining waste disposal in aquifer! [Ex. 6 Personal Privacy (PP)]

OBVIOUSLY, there should be no aquifer exemption for Powertech (USA) Inc.'s uranium recovery project. NO. Again... NO. P.S. I'm sorry you have to work for Scott Pruitt. [Ex. 6 Personal Privacy (PP)]

No to uranium mining waste disposal in SD aquifer. [Ex. 6 Personal Privacy (PP)]

Absolutely no! This is completely insane! [Ex. 6 Personal Privacy (PP)]

No. Just, no [Ex. 6 Personal Privacy (PP)]

This proposal is simply obscene. Please do everything you can do to stop it. [Ex. 6 Personal Privacy (PP)]

No! No! No! Radioactive waste in the Aquifer!!! No! No! No! [Ex. 6 Personal Privacy (PP)]

I am contacting you to voice my opposition to allowing uranium mining waste disposal in SD aquifer. [Ex. 6 Personal Privacy (PP)]

I am writing to voice my strong opposition to the EPA issuing Underground Injection Control Area permits to Powertech Inc for injection activities related to a proposed uranium recovery project in the southern Black Hills region in Custer and Fall River Counties of South Dakota. I am specifically horrified that the EPA would allow an exemption approval in connection with the draft UIC Class III Area Permit. Specifically, this approval would exempt the uranium-bearing portions of the Inyan Kara Group aquifers from protection under the Safe Drinking Water Act. Such an exemption must be in place before ISR activities within these aquifers can occur and strongly oppose this exemption. Thank you for considering my voice and views in this matter. [Ex. 6 Personal Privacy (PP)]

I'm against this. please help save our country [Ex. 6 Personal Privacy (PP)]

Why not just force feed that waste to the people. Cut out the middle man as it were. [Ex. 6 Personal Privacy (PP)]

No!! [Ex. 6 Personal Privacy (PP)]

No to uranium dumping [Ex. 6 Personal Privacy (PP)]

## **@@Multi-topic (to be parsed out later)**

To: The Environmental Protection Agency

From: Ex. 6 Personal Privacy (PP)

Re: Azarga plan for deep well injection

Please include the following to your comments about the Deep Well Injection. Thank you.

There are many reasons why the EPA should deny Azarga any permit to mine uranium and/or inject toxic fluids into currently used aquifers in the Dewey Burdock area of South Dakota. The following will bring to your attention, once again, some of the most obvious.

1: The only reason this approach ( 4000 new bore holes for toxic waste disposal.) is being considered is the fact that the original plan to mine uranium In Situ is now irrelevant due to the low value of the material, the lack of demand worldwide, the lack of verifiable amount of uranium, a lack of verifiable funds to actually mine the radioactive product and of course the reality that alternative energy sources such as wind and solar are now employing more new workers than the oil and gas industries. These realities beg the question: "Why are we even considering this permit."?

One of the reasons for Azarga giving up on the mining was it's inability to clean up the waste from the mining effectively and intentionally poisoning the underlying aquifers and land surfaces. The injection wells will create the same problems of toxicity except in the injection scenario, the toxins will be forced into already necessary and utilized aquifers as opposed to the ruination of aquifer quality by transmissivity. The injection directly into these usable aquifers will simply accelerate the contamination of the aquifers.

3. Professional geologists and chemists from the South Dakota School of Mines, Chadron State and private practice have testified most effectively as to the danger of this plan for all the residents in the area due to the irreparable damage done to the water supply including the Deadwood, Minnelusa, Inyan Kara aquifers and the most important aquifer of all, the Madison.

The misuse or contamination of the aquifers in the Black Hills flies in the face of good judgment due to the increasing importance of usable water not just in drought affected South Dakota but the nation and the world. We are depleting our water supplies by allowing the very kind of destruction envisioned by Azarga and the EPA. With the demand for water ever increasing due to continued world population increases, it is imperative that the protection and careful usage of our water supplies be our guiding light. To actually embrace the opposite behavior is to violate the EPA stated purpose of actually protecting the environment. It is no longer possible to deny the threats to our remaining water supplies driven by In Situ mining and water ruination. Recent articles in several scientific publications have clearly demonstrated the danger to our water quality and supply posed by this mining and bore hole toxicity. It is your responsibility to make sure the water remains safe and by even considering a permit to allow this is a violation of your responsibility.

The fact that Platinum Partners, which is Azarga's largest share-holder, is being charged with a variety of misdeeds which if convicted could provide prison terms for the guilty, should be a wake-up call to the EPA as the kind of people who are running the show for Azarga. With the company based in China, overseeing a Canadian company with offices in Colorado, one can easily guess how Azarga feels about the long term health of the citizens in this area when compared to the greed for profit.

This a boom/bust scenario which if approved will provide 100 or so temporary jobs for a year or so and then only a handful of maintenance/mining operators. Whatever gain there might be for the employees and towns and counties will be more than offset by the cost for cleanup which will be borne not by Azarga but by those same towns and counties to the tune of scores of millions of dollars. The sad truth is that it cannot be remediated as it is well known that no In Situ mining operation, whether in Texas, Nebraska, or Wyoming or any other place, has ever been cleaned to original condition. It is not difficult to imagine that real estate values will drop, tax revenues for the towns and counties will drop if this ill- conceived rape of the land and aquifers is approved by the EPA.

Thank you for your attention. I hope this has been of some value in making your decision and I can only hope that you will make the right one.

Sincerely,

Ex. 6 Personal Privacy (PP)

My name is Ex. 6 Personal Privacy (PP) and my wife and I live on a small ranch south of Pringle and have been there for 26 years. Thank you for this opportunity to comment on Deep Well injection and uranium mining. My comments here were given at an earlier public meeting opposing the mining. injection

I am not a scientist nor an engineer nor do I receive payment of any kind for being opposed to the permits in question.. I am not a for profit corporation. I have no loyalties or any responsibilities to show a profit to any stockholders. I am free to do the right thing.

When commissioned as an officer many years ago, I swore an oath to uphold and defend the Constitution. The Constitution and the Bill of Rights of course support a prime directive: Clarify the responsibilities of the government and the rights of the people. Not businesses nor corporations' rights but citizen's rights. Our governments' responsibility is to the health and welfare of those citizens. Every civil servant, every citizen's board, every governor is accountable to the citizens who have allowed them to serve and if they do not protect the health and welfare and the rights of the people then they have abrogated their prime directive.

My references for this talk are the Power Tech/AZARGA permit application available from the South Dakota DENR most of which I have read, as well as the website of the NRC and the state laws regarding water and mining. I hope to bring your attention to what I believe are discrepancies and contradictions which should provide reasons for the denial of this permit application.

Despite P/T's repeated assertions that this operation would be safe, that is simply untrue. Nor is it true that radiation is actually good for you, nor that one can destroy radiation contamination by washing it off. PT spokespersons have been willing to freely state that scientific truths are nonsense apparently comfortable in saying anything that will support their cause regardless of it's falseness. This alone should force a denial of the permit. There are several issues that could interfere with the ability of P/T to actually perform this requirement not the least of which is that no ISL mining operation has ever remediated the land, waters and aquifers to baseline. Exemptions are asked for and usually given. This just provides the excuse to contaminate and not remediate. This obviously does not a safe operation make. If P/T actually cleans up and remediates the land and waters to a clean uncontaminated state, it will be the first operation to do so in the history of in situ mining. This is well known and incontrovertible.

First: 5.6.2.1 of the application states that the slope of the permit area is 2 to 6 degrees to the SW. Due to the location of Pass Creek and Beaver Creek, this slope will force any drainage from leaks and spills and land applications of contaminants plus precipitation to flow SW into these creeks and thus to the Cheyenne River and to Angostora, the Pine Ridge and the Missouri River. This is especially true during heavy downpours such as we experienced this summer which created a 4 foot wall of water that derailed dozens of RR cars and the damaging flooding in the Boulder area which released gallons and gallons of contaminants. These floods will happen again. When they do, there will be precious little to prevent damage to the mining area, not to mention a flooding of the contaminants on the ground. As indicated in 3.39 of the application, and I quote, " the hazard for wind and water erosion... varies from negligible to extreme" "to extreme"! This obviously should be of "grave concern" to quote the Rapid City Council. And if the rainfall from our own downpours can cause a train derailment then it can cause other erosion as well. This indicates that the promises of safe containment should be considered questionable.

Second: PT will tell you that there is no communication between aquifers because of confining layers. However, in 3.4.1.4 it states that the Madison aquifer is 200 feet thick in the southern Hills up to 1000 feet regionally and could be connected to or communicate with the Minnelusa and the Deadwood aquifers which are the chosen repositories for the contaminated waste water, which will be injected under pressure. This communication could prove to be unsafe for obvious reasons. Additionally, in 3.4.1.7, P/T states that "no

evidence of karsting has been observed". (erosion due to dissolution producing fissures and sinkholes) This is a below ground phenomenon and simply because something has not been observed at this time does not mean it will not occur later or that it is not there now. As the cave system in the Hills is known to be everywhere, it is only logical that there are fissures everywhere which will allow for "communication" between aquifers as stated above.

Third: Figures 3.4-17 and 3.4-20 show the open pit mines, the number of well holes and the down gradient and how the ore bodies on the east will flow directly into Pass Creek, and thence to Beaver Creek while the ore bodies on the west side will flow directly into Beaver Creek. In 34.5.3.9 P/Ts plans will account only for a 100 year flood. This plan does not take in account global warming, mega storms, floods, tornadoes, droughts etc. and plan to stop the flooding with a few well placed hay bales and ditches and berms. A 4 foot wall of water will not be controlled by these meagre efforts. In 5.4.2.3.2 PT simply states that the runoff will be managed with no indication of how they will actually do it beyond the attempts mentioned.

Fourth: In 3.6 P/T anticipates the potential for problems from winds and wind erosion with Fig 3.6-39 showing the wind directions and speeds in the mining and land application areas. The evapotranspiration will leave contaminated residue on the land to be blown away with the winds or washed away by the rains. In 3.11 "The landscape comprising the permit area is erosional in nature." This admits to the problem outright and taken at face value should indicate the inappropriateness of the area for the mining project. Additionally, we are told that radium will be the main contaminant and will simply sink to the bottom of the ponds (where it will sit up to 18 months with no covers before being removed or injected) but Table 3.4-10 shows the other dangerous byproducts of this type of mining. These include thorium, arsenic, cadmium, mercury, thallium, polonium and radon in addition to the uranium and radium. These dangerous by-products of ISL mining on the land and in the water cannot possibly be considered safe for wildlife, livestock or humans. In fact, P/T in 5.4.1.1.3, goes only so far as to say that the lead and thorium will be "treated as necessary" but fails to provide the details. In fact, how does one treat radon, or radioactive cadmium or arsenic??? These poisons will become concentrated due to the re-injection and recirculation of the water into and from the IK making the IK more contaminated rather than less. PT will tell you that the IK will get cleaner due to the bleed. I believe this is illogical nonsense.

Fifth: In 5.0 it states that "potential environmental impacts will be minimized". There are two problems with this statement: a) It admits that environmental impacts will occur and b) it accepts the fact that they have no intention or do not have the ability to actually remediate these impacts just minimize them. This is not in the public interest and indeed violates state law regarding non-contamination of public waters. Of interest is 6.3.4.2 where it states that P/T will provide "95% confidence that the ...units"... will..." meet the cleanup guidelines or action levels". Minimum? 95% confidence? 95% of the cleanup guidelines is unacceptable and if that is the best they can do, then the permit needs to be denied. Indeed, P/T makes no offer to do anymore than what they decide is reasonable. Additionally, in 5.5, "Solid wastes such as pond sludge; soils contaminated by leaks; spills of loaded or spent IX resin; filter sand...parts; equipment...will be disposed of at an NRC... facility". This a very general statement which lacks specifics as to the method of gathering up all this radioactive contamination which will have drained into the soil in and outside of the permit area. The fact that they know about the leaks, (such as the dozens of leaks at Crowe Butte in Nebraska,) but cannot or will not prevent them must be cause for alarm. The public needs more assurance than this. 5.3.9.2 states only that erosion of disturbed areas will be minimized. There are three problems with this assurance. a) P/Ts admittance of the disturbed areas in the first place, b) they will not try to prevent any erosion outside of the disturbed areas only minimize the erosion inside the disturbed areas and c) they admit that they will not even attempt to repair the erosion to its original state. Public health is not served by this cavalier attitude towards runoff prevention. In 5.3.4.4 it admits that "all grades will provide for natural runoff" which as we have seen only further guarantees the flowing of contamination into the creeks and rivers. In 5.4.2.2, In reference to hazardous waste and "used oil"? "it is likely that this project will be classified as a conditionally exempt small quantity generator". CESQG This classification allows for up to 1000kg of hazardous waste a month or 12000 kg a year. What if it isn't so classified? Well, then, P/T simply assumes that they will obtain "the appropriate approvals or permits". This expectation of creating hazardous waste that needs yet another permit or approval due to its dangerous qualities should cast additional doubt as to the viability of this company to properly handle

the responsibilities of this kind of operation. Another concern is in 5.5.1.2.3, where it states that excursions must be reported within 24 hours but the permit allows for a delay in correction of the excursion up to 30 days. 30 days!!! This is not a minimization of contamination. With the DENR no longer authorized to monitor and inspect the mining operation due to SB158, the danger of failure to correct and the allowance of the problem to continue is very real.

Sixth: 5.6.2.1 Potential soil impacts: Two to six % slopes will cause rain and wind erosion. Impacts to disturbed areas include: compaction, loss of productivity, loss of soil, salinity, soil contamination caused by clearing, excavation, leveling, stock piling, and redistribution of soil. "Due to the use of heavy machinery and high volume..... ..some soils have the potential of compaction." This can "lead to decreased infiltration, thereby increasing run off". This compaction "will be restored as possible following use." (Ten to twenty years later!!!)

The hazard for wind and water erosion vary between negligible and severe. Severe!!! P/T admits to the danger of compaction and erosion and then PT admits to build up on land of disposals of waste, salts, radionuclides, metals, metaloids, and the loss of soil fertility. This is not 95% clean or minimized or reasonably achievable or even a best effort. This is simply not proper and responsible work. Page 5-118

lists all the problems with spraying multiple contaminants on land, which I won't belabor as it has been covered by others. 5.6.5.1.3 PT accepts the potential of accidents which could release pollutants such as bulk chemical products, uranium loaded resin, dry yellow cake, solid by-product material. PT says it will simply remove the contamination. They do not say how unless you count their claim that it will wash off clean with water. They admit that the consequences of these spills range from minor exposures to "significant". And lest there be any doubt that this area will be radioactive and dangerous to human health this sign will be posted.:

#### 5.7. 2.4 ANY AREA WITHIN THIS FACILITY MAY CONTAIN RADIOACTIVE MATERIAL.

Seventh: Another issue is the cost of reclamation. In their socioeconomic report, P/T allows for \$9 million. The bond is only 1.5 million ( which is less than \$150 per acre or about one hour of dozer work) but it also acknowledges that the expected cost for reclamation could be as high as 75 million if I am not mistaken. And if WY is any guide, it could be as high as 150 million. The ability of P/T to afford even the 75 amount, depends on the amount of uranium removed and therefore the amount of yellow cake produced. The other side of the coin is the price for yellow cake to support this kind of expenditure. P/Ts figures rely on the price of \$65. This of course is only a hopeful number as the current price is below \$40. But even at \$40, there will not be profit of over \$200 million available for this kind of activity but rather, if my math is approximately correct, closer to \$50 million. If the remediation is to cost upwards of \$75 million, well...you can see that this just doesn't figure or as my rancher friends like to say, it doesn't pencil. If the company can't sell at \$40 then what is to become of the remediation after the mining? if they can sell at \$40 or below then what funds are going to be available to attempt the remediation in the first place? This is a very unhealthy set of circumstances.

Eighth: As we all know, and that includes the EPA, the NRC and P/T, the USGS has stated that there has never been an ISL mining operation that has returned the soil and water to a clean, before mining status. Not WY, not TX. If P/T wants to mine uranium in the Dewey-Burdock, then it has a debt to the people of the area and should guarantee in writing that they will clean up the soil and water to a clean uncontaminated state. That is what CO wanted. The Project Manager said at his meeting at the Fall River Conservation office recently that P/T would indeed guarantee completely that it would clean up the permit area 100% with no mention of minimum, no mention of 95%, no mention of putting forth a "best effort", but a verbal guarantee to absolutely clean up the permit site and the aquifers. Let us have a contract to that effect. It is my understanding that P/T would not/could not provide that guarantee to Colorado nor could it find 5 ISL operations that had cleaned up the water and the land as proof that it could be done. That is why P/T left Colorado empty handed and came to a sparsely populated area of the Black Hills in the hopes of trying it here. With some success I have to admit due to the state legislature having failed the citizens of this state by weakened the mining and water requirements for ISL mining and removing DENR responsibility of oversight. Not surprisingly, the bill was written by a P/T lobbyist. RCJ 22nd

Ninth: One of the serious problems I see with this operation is the lack of mining experience of the people in charge. For example, the company has yet to mine uranium. The Project Manager has never been a project manager on any other ISL and in fact has done very little "engineering" of any kind for many years. The executives have experience in the nuclear industry and in administration but not in managing and mining an ISL uranium mine. At least not according to the CVs. This is a very complicated and potentially dangerous and very expensive proposition. One of P/T spokespersons is a former Professor at the School of Mines. He has not mined any uranium at an ISL mine. The CEO has not mined any uranium at an ISL mine. They have not developed yellow cake, they have never remediated an ISL area. What they have accomplished is to file a permit application. And that after many corrections from the NRC and the DENR. I have to believe that this has to be their first filing for an ISL mining permit. So...this will be a trial run for P/T personnel, a first time operation. I am sorry but I have no faith in a lack of experience. I need to see years of experience in the ISL industry with a record of clean remediation and contamination containment. Based on their inability to produce a clean permit application without DENR and NRC assistance and their lack of experience and their public admissions that there will be leaks and spills and runoff and contamination of the soils, there is no reason to expect P/T to be able to keep the public safe from this contamination or remediate the operation to even a minimum standard. Indeed, their stock price would not be pennies a share if investors had any faith in this management and this operation. ARSD 74:29:07 clearly states that "The individual who develops the reclamation plan must be competent in the management and planning of the specific type or types of reclamation selected." With no prior experience in reclamation, P/T clearly fails this test.

Tenth: 6.3 The project manager told me that I could actually drink a glass of radioactive water with no ill affects, that if one were to be subjected to radiation poisoning that this could simply be cleansed by the normal body functions or washed off with no ill effects, that radioactive equipment and material could be cleansed and made neutral if you will, by a high pressure wash system. In my mind, this demonstrates a complete lack of knowledge about radioactivity and the dangers of radioactive contamination. P/T says it can decontaminate the soil yet previously stated that contaminated soil would be removed to a NRC approved site and that contaminated equipment will remain radioactive and either be taken to another site or if liquid, injected into existing aquifers. Contaminating aquifers is not minimizing that contamination. It is just putting it out of sight. We have heard about "permissible limits", 95% cleanliness, minimized contamination, and recently a guarantee to contain the contamination within the permit boundary. The NRC allows that the permittee needs only to remove the contamination to as low as reasonably achievable (or ALARA). But we are told that it will be 100% cleaned. As mentioned previously, the NRC knows it can't be done cleanly so it abrogates its prime directive and puts the health of the mining operation in front of the health and safety of the citizens. The ALARA is in direct contradiction to that directive. Any DENR approval of this operation is in direct contradiction of its purpose to protect the people. There seems to be no true agreement as to just exactly how far any remediation has to go to qualify for a job well done and as we know, the contamination from an ISL mining operation is not cleanable. This vagueness should be, especially at this late stage, grounds for a denial.

There are several situations that require the Mining Board to deny a permit of this kind

((They are 1-40-27:

(1) (a) If the permittee has intentionally misrepresented a fact

If the permittee has had any permit revoked (denied) under the environmental laws of any state. (Colorado comes to mind.)

(2) The applicant substantially duplicates an application within the past 5 years that has been denied, the denial having not been reversed by a court of competent jurisdiction)))

45-6B-32:

(6) The proposed mining operation and reclamation cannot be carried out in conformance with the requirements of 45-6B-35 (grading, disposal of refuse, removal and handling of topsoil, disturbance to hydrologic balance, slides-subsidence or damage protection-fencing, and reclamation)(-38 states will not pollute surface or ground water!!!)(-41 Disturbance to hydrologic balance. Any disturbance to the prevailing

hydrologic balance of the affected land and of the surrounding area and to the quality and quantity of water in surface and groundwater systems both during and after the mining operation and during reclamation shall be minimized.)

45-6B-33:

Reclamation of the affected land pursuant to the requirements of this chapter is not physically or economically feasible.

According to today's RCJ, P/T lobbyist and Program Manager "speaking at a Rapid City Council committee meeting in August, conceded that if the project goes through, the company will need to somehow fund it." "They will need a larger financier going forward", Hollenbeck said, adding that it could lead to a joint venture or selling more stock, or perhaps selling the company. "It may be a sell-out of the project," he said. "I don't know that." P/T hasn't the financing to even start the project even with over 50 million shares being sold. How can this board approve this permit when they have financing for neither the start nor the finish.

THIS HAS BEEN SHOWN AND THE PERMIT SHOULD BE DENIED.

(2) Substantial disposition of sediment in stream or lake beds ,landslides or water pollution cannot be feasibly prevented

THIS HAS BEEN ADMITTED AND APPLIES. THE PERMIT SHOULD BE DENIED

The proposed mining operation will result in the loss or reduction of long range productivity of an aquifer, public and domestic water wells, watershed lands, aquifer recharge areas, or significant agricultural areas

AS A RESULT OF THE BILLIONS OF GALLONS OF WATER USED AND CONTAMINATED, THIS IS HIGHLY PROBABLE AND THIS PERMIT SHOULD BE DENIED.

The Board finds that any probable adverse socioeconomic impacts of the proposed mining operation outweigh the probable beneficial impacts of the operation. Contamination would affect tourism, ranching, domestic water supplies, and the future economic health of the region.

EVEN AT \$65, THIS IS NOT A VIABLE ECONOMIC UNDERTAKING. AT \$40 IT IS A FINANCIAL IMPOSSIBILITY. THIS BOARD HAS A CLEAR AND LEGAL RESPONSIBILITY TO STRONGLY OPPOSE AND DENY THIS OERMIT APPLICATION

\*\*refer to the Letter of opposition from the FR Conservation District as one example and the "grave concern" of the RC Council\*\* I also ask the Board to consider and recognize the hundreds of signatures of people who have signed their names in opposition to this permit. As you know, these signatures represent upwards of 10 to 20 times those who are opposed. Please deny this permit.

Thank for your attention.

If time allows, I would like to read this at the May meeting in Hot Springs and will provide a hard copy if requested.

Sincerely,

Ex. 6 Personal Privacy (PP)

After reviewing both the Class III and Class V Draft Area Fact Sheets pertaining to the Azarga Mining Proposal, I am confounded at how the EPA can even consider allowing such a project to go forward. The list of probable and possible damage that are revealed in these reports are truly frightening. The EPA's own questioning of facts offered by PowerTech is reason enough for disallowing of this permit, but I will try to offer other clear and pertinent problems with this criminal endeavor. First of all, as I mentioned in my original



response, this project will be conducted only a mile and a half from a major fault zone. That in itself is reason enough to disallow this work. Page 26 of the Class III fact sheet openly admits that "many other faults are probably present but not discernible because of poor exposures." That fact, coupled with PowerTech's ridiculous assertion that any faults or fractures found in the injection area can be later avoided by modifying the pattern of the lixiviant flow around the faults or fractures, leads me to the conclusion that there is no way for them to stop a leak of toxic lixiviant into other areas. That type of fluid breach in a known fault area must be considered a factor in future slippage events and spoiled water sources. Page 22 of the same report supports the fact that "at least one breach in the Fuson confining zone" has occurred and strongly implies that other breaches will be found. The shale containment formation mentioned on Page 19 states "shales tend to be less permeable than sandstone" yet nowhere does it state that shale is 100% resistant to fluid breach. Considering the fact that at least 19 separate water wells are active in the area and PowerTech has shown little or no ability to contain their possible or probable breaches, the idea that this project is safe cannot be considered seriously. Page 37 of the same document admits that prior drillholes "may not have been plugged in a manner that would prevent communication between subsurface aquifers." Reading these reports, it is obvious that PowerTech has showed continuous deficient care in operation and responsibility to its geologic and aquifer environment. If the EPA wishes to do its job and protect the ecology and environment of the Black Hills, it will read its own reports and come to the easy conclusion that this is both a dangerous and irrational project.

Ex. 6 Personal Privacy (PP)

## @@Concerns about general environmental impacts

&&Here are my comments on the Underground Injection Control Program's Draft Permits for the Proposed Dewey-Burdock Uranium Mine and Deep Disposal Wells:

- Old uranium mines in the Dewey-Burdock area should be fully reclaimed before new mining is permitted.
- Adequate oversight of the quality of liquid wastes pumped into the Minnelusa Formation through the proposed deep disposal wells will be impossible, and our groundwater is likely to be contaminated.
- A full survey of cultural and historical sites is needed before mining or deep disposal is allowed. Cultural and historical sites must be protected.
- The proposed mine and deep disposal wells are in an area that is documented to have faults, fractures, breccia pipes, and over 7000 old boreholes that have not been properly plugged. It will be impossible to contain mining fluids or waste liquids, and contamination of our groundwater is very likely.
- The history of uranium mining indicates that uranium mining cannot be done without creating and leaving contamination. This project should be stopped until it can be proved to be safe, rather than relying on imperfect protection and clean-up processes. *Post cards from*

Ex. 6 Personal Privacy (PP)

### Ex. 6 Personal Privacy (PP)

There are too many possibilities for error and too many risks associated with the waste injection methods for this to move forward. Please protect our environment and deny the exemption- please prioritize our children's health over profit. Ex. 6 Personal Privacy (PP)

I'm part of the #WomensMarch movement. I'm from Colton, New York, and I'm concerned about uranium disposal in South Dakota. Here's why it should never be acceptable to poison the earth and its natural resources that we depend upon. Please do not approve the contamination of these precious resources that are depended upon. They feed and nourish our children and all of us. This disposal method can never be undone. In the first 100 days of the new administration, I hope that you understand and take these concerns seriously. Sincerely Ex. 6 Personal Privacy (PP)

No mining waste in our aquifers! No! Do not allow mining operations to inject mining waste into the underground aquifers in South Dakota! Protect our land, protect our air, protect our water. That what the EPA does best. *unsigned*

While the EPA might be gutted financially, my hope is there are people there that still understand the important of keeping our waterways, and airs clean of all pollutants. This project would be an unbelievable hazard, contaminating the Inyan Kara aquifer which is being used for agriculture, as well as contaminating other aquifers. Mining wastes are often radioactive and would create a permanent hazardous waste dump site in the Black Hills. One needs to only look at what happened in Brazil with the Doce River to understand the potential calamity a project like this represents.

I would appreciate if you officially include my comment - while I may not live in South Dakota I have relatives that do. I also spent some time reporting from Standing Rock in the last year. Furthermore the pollution of waterways effects all of us directly. Every body of water is connected to another, to our soil where we need food to grow so we can survive.

Ex. 6 Personal Privacy (PP)

Formal comment under the authority of the Safe Drinking Water Act and UIC program regulations, regarding:

- Proposed two Underground Injection Control (UIC) Draft Area Permits
  - Proposed aquifer exemption decision for the Dewey-Burdock uranium in-situ recovery (ISR) site near Edgemont, SD
- I urge the EPA to deny both of these permits. Among other hazards, radon emissions, toxic heavy metals and other pollutants, including chloride, sulfate, sodium, radium, arsenic and iron, are in ISR wastewater ponds. Accidents and leaks in this kind of operation are inevitable, raising concerns about runoff into the Cheyenne River and Angostura Reservoir. As you are aware, the most serious radiation release in the US came from a tailings pond spill at a uranium mine in New Mexico. We can live without uranium but not without clean water and soil. Ex. 6 Personal Privacy (PP)

Please accept this email/communication as a formal comment regarding the proposed two Underground Injection Control (UIC) Draft Area Permits and one associated proposed aquifer exemption decision for the Dewey-Burdock uranium in-situ recovery (ISR) site located near Edgemont, South Dakota, under the authority of the Safe Drinking Water Act and UIC program regulations.

I urge the EPA to deny both of these permits. Among other hazards, radon emissions, toxic heavy metals and other pollutants, including chloride, sulfate, sodium, radium, arsenic and iron, are in ISR wastewater ponds. Accidents and leaks in this kind of operation are inevitable, raising concerns about runoff into the Cheyenne River and Angostura Reservoir. As you are aware, the most serious radiation release in the US came from a tailings pond spill at a uranium mine in New Mexico. We can live without uranium but not without clean water and soil. **Ex. 6 Personal Privacy (PP)**

#### **Ex. 6 Personal Privacy (PP)**

PLEASE do not allow these permits! Protection for our environment is systematically being removed. South Dakota has had more than its share of environmental rape. But protecting our environment is important, whether this occurs in South Dakota, Wyoming, Oregon or any other state. Please do the right thing and deny these permits. **Ex. 6 Personal Privacy (PP)**

I after reading the entirety of the documents, I am just going to restate my comment under a Trump administration reality has gone on holiday. There is nothing but bad (you, know, long after the fact bad) to come from this, and it is the duty of the EPA to ensure the environment comes before corporate gains! **Ex. 6 Personal Privacy (PP)**

I do not know a word that properly expresses how strongly I oppose to this act. Of course, this act should not be considered okay anywhere but, having relatives in multiple places near the Black Hills the idea of putting radioactive waste in the ground and therefore ruining the beautiful, wild Black Hills is sickening. I beg you, please do not let this happen! **Ex. 6 Personal Privacy (PP)**

Once again we run the risk of standards for treating the waste not being stringent enough and residents enduring dangerous consequences over time. And once again, big business seeks to make tons of money off the backs of the little guy, we common folks, who do not have the money to buy the power to stop them. When will we return to the concept of the common good? The EPA can embrace that concept and apply it to this situation. Please oppose this project of uranium mining. **Ex. 6 Personal Privacy (PP)**

Please, there are some things that we can't get wrong, and this is one of them. Clean-up is near impossible and will not be an option. Some things can't be reversed. Between this and the proposed healthcare repeal / replace, you're going to actively kill off people. Is that what you really want? Please, be a responsible government for all the people, not just a few who will benefit from this. **Ex. 6 Personal Privacy (PP)**

I am writing to express grave concerns about the plans to mine uranium in South Dakota. There seem to be clear environmental risks at stake and I am not reassured by the EPA's assertion that it has consulted with experts or with local Indian tribes. There is no way to guarantee that accidents won't happen and that it not a risk that I am willing to take. As a citizen of the US and a member of the public, I am staunchly opposed to this step. **Ex. 6 Personal Privacy (PP)**

I am writing to express my concern about the proposed uranium mining in South Dakota. I am very much AGAINST this idea and urge you not to proceed! This is very dangerous for our environment. **Ex. 6 Personal Privacy (PP)**

Please stop with these bad ideas, that only harm us all. **Ex. 6 Personal Privacy (PP)**

You must withdraw these permits for the sake of residents impacted by the injections and the slippery slope you will create by even considering such reckless activity. I urge this agency to reject both activities immediately. **Ex. 6 Personal Privacy (PP)**

I am writing to urge you to deny the exemption for the uranium mining project. The cost of this project to human health vastly outweighs the benefits; **Ex. 6 Personal Privacy (PP)**

Profits are not to be placed above people. Period. Push these companies to abide by new regulations and hold them accountable for damaging our country, our welfare and overall quality of life. Ex. 6 Personal Privacy (PP)

Please I beg of you-no uranium mining waste released into SD aquifer!! You are effectively dooming the planet, and all her children, with your crazy CO2 beliefs and reckless and wanton destruction of our delicate environment. SHAME Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

I am against this proposal, as all the caring neighbors in the Custer Highlands subdivision. We are close to the site and dont agree with the pollution associated with the mine. It would permanently contaminate the water and make surrounding properties unlivable. Most of the residents here have come from another place and gravitated toward this area because of the natural beauty and healthy wildlife. Bringing toxic waste to the surface is not what this beautiful area is all about. Please reconsider and SAY NO!!! Ex. 6 Personal Privacy (PP)

NO NO NO, it is not OK to mine uranium. Do your job EPA and start protecting people and the environment. It is treason to put corporation profits ahead of the job you are supposed to be doing. Ex. 6 Personal Privacy (PP)

Please do not allow uranium mining waste disposal in aquifers or streams. It is the EPA's job to protect people and ecosystems, not pander to mining and energy interests. Ex. 6 Personal Privacy (PP)

I would like to voice my concern for the allowing permits on this project. It is only common sense that if you allow any of these activities, they will eventually have an effect on the environment around them. I say NO, resoundly to allowing any type of injection mining any where in our country. We need to invest time, money and efforts into renewable energy sources and stop all dirty fuel mining now and in the future. If we don't stop now, it will soon be to late. Again I say No to allowing these permits. Ex. 6 Personal Privacy (PP)

If accessing this water will be for profit then you will just be adding to the stresses of mankind.

If you get it done in a not for profit manner i can agree with it, otherwise my answer will be no. Ex. 6 Personal Privacy (PP)

After reading the proposals I would like to ask the EPA, please do not grant Powertech these permits in SD. This project carries a lasting risk and is unnecessary. A clean environment has immeasurable valuable, do not allow Powertech to exploit it for profit. Ex. 6 Personal Privacy (PP)

## **@@Concerns for contamination of the Cheyenne River**

Given the track record of mining in the Black Hills, gold and other, and of global corporations which are more interested in the bottom line than in the common good, I would definitely oppose any such mining, no matter what the method, in the southern Black Hills. The Cheyenne River already has pollutants from gold mining flowing through it to communities which rely on that river for drinking water. The fiasco of dumping uranium tailings near Saint Stephens, WY, and their subsequent costly removal, and the millions of dollars spent by the DOE to monitor ground water and provide clean water for those who were affected by in the area, convince me that uranium mining is of no practical benefit to the nation, and much less to those in South Dakota who potentially will be affected by it. Refuse the permit. The risk is not worth the money to be generated. Ex. 6 Personal Privacy (PP)

## **@@Concerns about water quality monitoring**

After studying and researching pages and in permitting ISU mining, and knowing how long it has been since the last water testing on wells for the above named project; I am proposing that the water should be retested along with the leaching, etc. Conditions of groundwater can and do change. There also were test conducted besides the company that was hired by Powertech, and two of three as it showed did not recommend ISU. Thank you for The consideration. Ex. 6 Personal Privacy (PP)



## @@Concerns about impacts to aquifers & contamination of drinking water

Thanks soo much! I just spoke to the Hot Springs City Engineer, Tracy Bastian, who said the city of Hot Springs, as well as many other private wells in this area, get their drinking water from the Minnelusa Aquifer. I would expect that if Power Tech/Azarga, before being seriously considered for this project, should be responsible for providing and paying for a baseline water test of the wells that provide drinking water from the Minnelusa Aquifer. Unfortunately, once the damage is done, there will be nothing that anyone can do to restore our drinking water to its original purity except to lower the standards for safe levels for the contaminants, as has been the case where contamination has occurred at other in-situ sites. Please include this to my written comments regarding this project.

I write to you regarding my concern for our drinking water supply, which I believe may be in jeopardy if the Dewey Burdock Uranium project is approved. I am attaching my personal well report along with just a small sample of others that I am aware of. According to Hollenbeck, Power Tech/Azarga plans on re-injecting the solution they use to extract uranium, back into the Minnelusa Aquifer. That is were so many of us get our drinking water and this is unacceptable!! I feel an urgent need to provide you with the link and person who is my 'go to pro' at the SD DENR to verify and answer any questions you have while trying to determine whether this project should be allowed. Please do your due diligence and throughly research the aquifer use. Even the most successful in-situ mining operations have left the water worse than it was before they started and we are not willing to run any risks with our drinking water! Hollenbeck keeps saying we have nothing to loose, but he is wrong! Thank you!

the link is: [ [HYPERLINK "http://arcgis.sd.gov/server/denr/wellLogs/default.aspx"](http://arcgis.sd.gov/server/denr/wellLogs/default.aspx) ]

You can contact Ken Buehler at 605-773-3151

### SD DENR Wells Completion Reports

Ex. 6 Personal Privacy (PP)

I am respectfully asking that you stop the Chinese mining company from ruining the black hills. The uranium mining is something we need to stop doing to our planet and we have learned too much about the damages to our fresh water sources and the damage we can cause with these practices. Thank you very much.

Ex. 6 Personal Privacy (PP)

Spent the rest of yesterday sorting thru all my saved papers and documents to find the two sources that were against the project. So far I only came up with one, which (I am sure) You're already familiar with. I attached the PDF file anyway. The other info I found is incomplete and needs further research , are two names Prof. Thomas Borch and Prof. James Stone. These gentlemen did a study on the effects of ISR mining on groundwater. Contacted Clean Water Alliance with this info, maybe they can contact them easier. Will contact you when /if have more info.

Ex. 6 Personal Privacy (PP)

Thank you for your response regarding deep well injection into usable and used aquifers .It is disheartening to realize how simple it is to save the water from contamination yet witness the refusal of those responsible for that water to safeguard it. Sadly, The EPA has just allowed the continuation of a poisonous herbicide/pesticide rather than remove it from use. I look forward to the hearings.

Ex. 6 Personal Privacy (PP)

I would think that special consideration would be given to an area that has already shown earthquake activity and that is so directly linked to water supplies throughout the southern Black Hills.I consider this proposed project an exercise in foolishness, and considering the catastrophic outcomes that are truly possible, an endeavor with criminal intent. I would certainly hope that the EPA will be dubious of the opinions of Uzarga geologists who will suggest that their "experiment" will be 100% foolproof. The southern Black Hills honors its water supply and considers any threat to its viability a direct threat to the entire Black Hills area. With so much to lose in one of the premier recreational and tourist areas of the world, this project falls far short of any sensible consideration.

Ex. 6 Personal Privacy (PP)

As this issue has been extended for quite a while now, I will not start from scratch is detailing how unacceptable is the EPA consideration to allow injection of toxic waste into usable aquifers here in south west South Dakota. I will simply bring to your attention the fact that the EPA stands for Environmental Protection Agency not "Environmental Destruction Agency". It is sad enough to consider uranium mining when there is no profit available, no safety from radiation exposure and no protection from drainage into surrounding watersheds. To purposely ruin usable, potable and important local aquifers and state water supplies is mindless at best. Ex. 6 Personal Privacy (PP)

An exemption to the Safe Drinking Water Act is being sought as part of this project. Protection of drinking water is necessary and should be a basic function of a government that is concerned with its citizens' health and well-being. If the EPA abdicates itself of this responsibility to the people of South Dakota, those people's health and livelihoods will be put at risk. It will potentially add to the burden of the healthcare system and could ultimately results in lawsuits costing the EAP millions of dollars, for which the US taxpayers will ultimately be responsible. Ex. 6 Personal Privacy (PP)

Do you drink water? Why do you want to poison ours? What should be a no brainer is a money issue, big money!!!!!! Please do not sell us out, no one will be happy unless everything is poisoned. PLEASE, NO Ex. 6 Personal Privacy (PP)

Please do not grant an aquifer exemption for the UIC area permits to Powertech USA. We must protect our aquifers from contamination. They are a non-renewable resource, and contaminating them would likely have long-term consequences for humans. I object to risking a public resource that belongs not only to this generation but to future generations to come. Allowing the aquifer to be contaminated short sighted and inexcusable especially if it is for private profit. Ex. 6 Personal Privacy (PP)

Please do not grant an aquifer exemption for the UIC area permits to Powertech USA. We must protect our aquifers from contamination. They are a non-renewable resource, and contaminating them would likely have long-term consequences for humans. I object to risking a public resource that belongs not only to this generation but to future generations to come. Allowing the aquifer to be contaminated short sighted and inexcusable especially if it is for private profit. Ex. 6 Personal Privacy (PP)

I am against allowing companies to inject uranium mining waste into the aquifer. They say it is cleaned, but what if it isn't? You can't clean it up after it has been injected. Ex. 6 Personal Privacy (PP)

This is stupid. Would you inject this into water you plan on drinking? Ex. 6 Personal Privacy (PP)

Comment submitted by --an interested party who is a US citizen, taxpayer, and user of the natural resources of the state of South Dakota, including but not limited to drinking water and consuming food while in South Dakota for travel and recreational purposes.

The permittee(s) should NOT be granted a UIC permit or permits that exempt them from applicable regulations that protect human health and the environment, and that protect the quality of the aquifer in the southern Black Hills region in Custer and Fall River Counties of South Dakota, and that protect this aquifer from contamination and deterioration in quality from the disposal of mining waste into or adjacent to the aquifer.

The EPA should not grant permits or exemptions to Powertech USA that would allow disposal of uranium mining waste in or adjacent to the aquifer in the southern Black Hills region in Custer and Fall River Counties of South Dakota. Disposal of uranium mining waste in or adjacent to the aquifer will result in the release of Radioactive substances including Selenium, that will poison the animals and other life in the area. The people of the United States, including its children, need this aquifer to be uncontaminated and protected by vigorous application of criteria and regulations applicable to clean water. The EPA should determine that the aquifer is subject to safe drinking water standards. Thank you for your serious consideration of this comment. Please weigh this comment in your deliberations. Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Regarding the request to place ISR process waste fluids into the Minnelusa Formation below the Inyan Kara after treatment, please consider this a request to absolutely not allow this type of activity here or anywhere else in the country.

We know, regardless of the type of process used, that the threat to ground water is not worth the risk. The resulting contamination may be low level and long lasting. We should not be putting residents at risk and with no option but to prove some sort of poisoning after years of drinking the water.  
Protect us! We need to be able to rely on our ground water! Ex. 6 Personal Privacy (PP)

Please do not provide an exemption for the uranium mining project in South Dakota. Aquifers are a water resource that many rely on for clean water. Protect the aquifer! Ex. 6 Personal Privacy (PP)

Please do not allow a uranium mining company to dispose of waste on a way that could pollute a SD aquifer.  
Ex. 6 Personal Privacy (PP)

I am writing to provide an opinion of the exemption rules proposed for this project.  
Why in the world would injecting uranium waste products into a fresh water aquifer even be considered for approval?  
Protect our drinking water, no matter where it is. An aquifer is not a garbage can for some mining company. Ex. 6 Personal Privacy (PP)

I am writing in regards to the draft permits and aquifer exemption for uranium mining project in South Dakota (<https://www.epa.gov/newsreleases/epa-seeks-public-comment-draft-permits-and-aquifer-exemption-uranium-mining-project>)  
Clean and safe drinking water need to be the preeminent concerns. The proposed mining could do irreparable harm to the drinking water and should not be granted an exemption. Ex. 6 Personal Privacy (PP)

In response to request for public comment regarding dumping into an aquifer, I suggest that the book, "Living Downstream" be required reading. We cannot return to the days of having our water systems polluted and damaged for the sake of corporate or personal gain.  
I have lived in an area where the rivers and water systems were polluted due to chemical dumping from byproducts of manufacturing and the long term effects remain for decades.  
Please do not let this happen, I am sending a resounding no. Ex. 6 Personal Privacy (PP)

I am very concerned the EPA is considering issuing a permit to Powertech for injection activities related to a proposed uranium recovery project. Please DO NOT issue this permit and endanger our wildlife and drinking water for the citizens of South Dakota. Ex. 6 Personal Privacy (PP)

I am appalled that anyone would think this is a good idea. I am almost speechless that it would be considered by the EPA. Please do not foul any aquifers. I would go so far as to BEG you to reject this idea. Aren't we supposed to be protecting this planet? Isn't this, in fact, our only home? Do not permit this disastrous proposal. Ex. 6 Personal Privacy (PP)

There is no safe level of Uranium waste in drinking water, and you won't be able to reach safe levels of uranium waste if you are exempting an aquifer from the safe drinking water act. By that very act you are saying that the people of that area don't deserve or need safe drinking water. Ex. 6 Personal Privacy (PP)

Please do not allow the aquifers to be injected with this waste. We cannot continue to contaminate resources needed for our survival. Ex. 6 Personal Privacy (PP)

I am adding my voice to state that the above subject is unconscionable! No, to permits to inject Uranium into aquifers. Water for the future but be kept safe! Ex. 6 Personal Privacy (PP)

Please do not make these permits permanent. Dumping uranium in aquifers is a bad idea. (Just so we're clear, I'm talking about the draft permits in the portion below.) [referencing the EPA March 6 press release] Access to safe, clean, inexpensive water is a human right. Do not allow these companies to poison our planet! Ex. 6 Personal Privacy (PP)

I'm writing in regards to the aquifer exemption for Powertech Inc and their uranium disposal.  
I really don't see a single reason to grant them this exemption. This will not only endanger those that rely on the water supply surrounding these well fields, but is a threat to the surrounding environment. It sets a dangerous precedent, as



long as a company pays off someone high up in the EPA or current administration, they can break what ever laws and regulations they want. Be better than this EPA. Stand up for something.

Ex. 6 Personal Privacy (PP)

I am writing to state my opposition to the draft Underground Injection Control Area Permits issued to Powertech Inc. for injection wells for the in-situ recovery of uranium in Inyan Kara Group aquifers. I am also opposed to the approval of an aquifer exemption, which would exempt portions of this aquifer from protection under the Safe Drinking Water Act. This exemption would set a dangerous precedent by exempting drinking water protections at the federal level. I am concerned for the health and safety of the citizens of South Dakota and Wyoming that utilize this aquifer; and for the tourists that visit the Black Hills and Mount Rushmore. Deep injection wells have the potential to leak.

Ex. 6 Personal Privacy (PP)

Please do not allow Powertech or any company to dispose of ISR process waste fluids into the Minnelusa Formation below the Inyan Kara. Putting waste, especially this type of toxic waste, into aquifers makes no sense and will lead to pollution that will have effects for generations to come. Putting short term industrial gain ahead of clean water is poor public policy.

Ex. 6 Personal Privacy (PP)

I oppose both permits related to the proposed uranium recovery project in the southern Black Hills region in Custer and Fall River. Injection wells for disposing of waste fluids into aquifers is a bad idea be it trusted or not. How much control or manpower is available to oversee that the injections do not include toxic chemicals being purged into our precious water supply. The companies that dispose this way have not been overly forthright in listing the chemicals that are used in their processes. Slow moving aquifers would not be able to cleanse toxics for decades or more endangering those that rely on the water for life. Removing these aquifers from the safe drinking water act just exacerbates the problem. We need more safe water not less.

Ex. 6 Personal Privacy (PP)

I am opposed to the aquifer exemption for the uranium mining project in South Dakota. Polluting water, no matter how remote, with radioactive and toxic waste is a horrible idea. Water is life and we have a finite supply. It needs to be protected for future generations.

Ex. 6 Personal Privacy (PP)

In regards to the uranium mining exemption- We must not continue to destroy our waterways and lands by allowing big business to dump wastes and bypass the protections provided by the EPA. The EPA's job is to Protect the environment although it appears that Mr Pruitt is unfamiliar with the concept. What could possibly make anyone think that allowing dumping near an aquifer would be a good idea except someone who doesn't live near by and is only concerned about making more money.

Mr Pruitt- Step up and protect the environment or step down!

Ex. 6 Personal Privacy (PP)

Please do not allow an exception to regulations and let companies dump uranium mining waste in an aquifer in SD. Please protect our clean water supplies.

Ex. 6 Personal Privacy (PP)

My initial thought when I heard of the proposed permits was "are they out of their minds?"

Who in their right minds would risk the drinking water for tens of millions of people, and the irrigation water of millions of acres of land for uranium mining?

I've worked in industrial hygiene and I can tell you that there's no way to make a project like this safe enough, secure enough to risk water for.

Do you realize that around the world there are major droughts happening? On at least three continents? And that has included this continent? Water is our most precious resource right now and it is not worth one penny's worth of profit to risk permanently damaging an aquifer like the one in South Dakota.

Drop this insane plan.

Ex. 6 Personal Privacy (PP)

The long term ( permanent) disadvantages of this proposal far outweigh the limited short term advantages. Please consider the future safety of Americans and our water supply before bowing down to mining companies.

The disadvantages of the in-situ leaching technology are:

the risk of spreading of leaching liquid outside of the uranium deposit,

involving subsequent groundwater contamination,

the unpredictable impact of the leaching liquid on the rock of the deposit,

the impossibility of restoring natural groundwater conditions after completion of the leaching operations.

Impacts of Uranium In-Situ Leaching

<http://www.wise-uranium.org/uisl.html>

Ex. 6 Personal Privacy (PP)

I would like to comment on the draft permit. I believe once an aquifer is impacted by uranium it is near impossible to clean it up. The idea that as it is in the same area as the uranium-bearing portions will lead to a legal fight that the permit holder will argue was the same levels prior to any potential release.

The contamination does not Naturally attenuate at any rate that will be successful to not have long term impact on health and human environment. Further, the type of contaminant is uniformly excluded from insurance policies that often insure these types of projects. Hence, if there is any release, the company will have to pay for the clean up and they will likely not have the financial resources to do so.

EPA is also proposing an aquifer exemption approval in connection with the draft UIC Class III Area Permit. Specifically, this approval would exempt the uranium-bearing portions of the Inyan Kara Group aquifers from protection under the Safe Drinking Water Act. Such an exemption must be in place before ISR activities within these aquifers can occur. Thank you for your consideration and please do not provide the permit with SFDA drinking water exemptions. Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

I oppose the EPA proposal that would allow for depositing uranium waste in drinking water. It is dangerous. Ex. 6 Personal Privacy (PP)

I find the use of injection wells in the Inyan Kara Group horrifying and should not be permitted. Further, this aquifer should NOT be exempted from the Safe Drinking Water Act. It is my belief that these permits should be rejected. It is my expectation that the EPA will ensure the safety of drinking water. Even though I do not live in the area, I find the fact that industry is so eager to compromise the safety of America's drinking water supplies disgusting and would not want these actions to affect the integrity of my drinking water. Ex. 6 Personal Privacy (PP)

As a concerned US citizen I would like to voice my opposition to the aquifer exemption being requested by Powertech. There is evidence that these measures would contaminate drinking and ground water and are a bad idea. As Americans we rely on the EPA to protect our citizens and environment, so please do your job. Ex. 6 Personal Privacy (PP)

I am writing to you as a concerned American regarding the proposed Draft Permits to allow UIC a permit for injection wells for the in-situ recovery of uranium in the Inyan Kara Group aquifers and a permit for deep injection wells that would be used to dispose waste fluids into the Minnelusa Formation below the Inyan Kara after treatment.

As we have seen in the past, while all precautions claim to be taken, what happens when the monitoring of the underground sources of drinking water become contaminated? It's too late then.

Also with regards to the aquifer exemption of uranium-bearing portions from the Safe Drinking Water Act. I am trying to figure out what good can be gained from this exclusion?

I am respectfully requesting that the EPA, in its infinite wisdom not grant these permits or exemptions. The Safe Drinking Water Act was put in place for a reason. Our future depends on the actions of the present. Ex. 6 Personal Privacy (PP)

This is not safe. There are no guarantees this will not contaminate the water. So let's not go there. Previously they were told no, the answer should still be no. Ex. 6 Personal Privacy (PP)

I'm sure your inbox has been inundated since the story went on twitter, so I'll keep this brief.

I am a citizen of the United States and the State of California. I feel that drinking water is going to grow significantly in importance in the near future, so I oppose any measures that threaten the safety and cleanliness of said water. I request that you deny any aquifer exemptions requested by Powertech. Ex. 6 Personal Privacy (PP)

I am writing to comment on the proposal to inject uranium waste into the Inyan Kara Group of aquifers as part of a proposed uranium recovery project. I would like to say that I am opposed to allowing uranium to be injected in these areas even after treatment.

I believe the risks to drinking water are too high. We cannot live without water. That is a biological fact. It is one of our most important resources. If there is even a slim chance that it will impact drinking water and people's health negatively, I believe it is not in our best interests. Ex. 6 Personal Privacy (PP)

The draft permits should be denied for the aquifer in South Dakota. Uranium mining waste should not be allowed anywhere near any kind of water source and dumping allowing the permits is highly irresponsible. Ex. 6 Personal Privacy (PP)

Destroying an aquifer in South Dakota to store uranium mining waste is insane when climate change is leading to water crisis around the world. Ex. 6 Personal Privacy (PP)

I read this proposed change and assumed that whomever sent this to me was pranking me. Surely the United States government would not be proposing permitting, among other things, the disposal of uranium mining materials into areas that are anywhere drinking water sources. This is unacceptable. Ex. 6 Personal Privacy (PP)

As a US citizen, I do not want Underground Injection Control (UIC) Area Permits to Powertech (USA) Inc., for injection activities related to a proposed uranium recovery project in the southern Black Hills region in Custer and Fall River Counties of South Dakota to be approved because of the impact on water quality in the region. Also, your email link does not work. Perhaps the parenthesis have something to do with that. Ex. 6 Personal Privacy (PP)

I am [a] High School Science teacher. I wish to express my concern for the proposed uranium extraction in South Dakota. My fear is once again money is trumping the environment! We can't keep putting our aquifers in peril for the sake of some companies bottom dollar. Our children will pay the price. Ex. 6 Personal Privacy (PP)

I was distressed to see that the EPA is considering issuing UIC Class III and Class V permits to Powertech, as well as an aquifer exemption approval. Describing this permission as "ludicrous" doesn't seem sufficient. The EPA should protect the right of people to have clean drinking water and uphold the legal protections like the Safe Drinking Water Act put in place to do this. No corporation should be given an exemption to these rules, and I oppose the granting of these permits and the exemption. Ex. 6 Personal Privacy (PP)

Allowing radioactive and other waste fluid into the aquifers sounds like a crazy idea. If there is any kind of mistake how would this be contained? I am against allowing this to happen. Ex. 6 Personal Privacy (PP)

Please do not exempt anyone from regulations prohibiting the injection of uranium et al into the aquifers. The mining company should still be subject to the regulations in place meant to protect the water. Do your job, please (directed at the agency, not you specifically) You are the EPA for Pete's sake! Ex. 6 Personal Privacy (PP)

The potential contamination of drinking water should be avoided at all costs. Our water is a limited resource. The monitoring of the water will not prevent contamination and once contaminated the water will be undrinkable and taste bad. How did uranium become more valuable than our drinking water? Stop all drilling and other activities that will or has the potential to contaminate our water supply.

What happens when the injection material gets into the aquifer? Will the companies pay to clean it up or does that fall on tax payer to clean up their mess. No to any and all drilling, mining, pipelines with the slightest potential to contaminate water. Ex. 6 Personal Privacy (PP)

In regards to the below *[reference to the title of the EPA press release]*, I am against both the uranium mining and most especially exempting the company from regulations on safe drinking water. That sounds like a bad idea for public health. Ex. 6 Personal Privacy (PP)

I am writing to submit my resounding opposition to these careless acts of environmental injustice. Dump uranium into aquifers??? How is this policy even possible with all the water quality problems in places like Flint, MI and Hoosick Falls, NY? Ex. 6 Personal Privacy (PP)

I am writing to state my opposition to the draft Underground Injection Control Area Permits issued to Powertech Inc. for injection wells for the in-situ recovery of uranium in Inyan Kara Group aquifers. I am opposed to the approval of an aquifer exemption, which would exempt portions of this aquifer from protection under the Safe Drinking Water Act. This exemption would set a dangerous precedent by exempting drinking water protections at the federal level. I am concerned for the health and safety of the citizens of South Dakota and Wyoming that utilize this aquifer; and for the tourists that visit the Black Hills and Mount Rushmore.

Ex. 6 Personal Privacy (PP)

Please know that issuing these permits is a bad idea and I am formally against this plan as it would further threaten underground water sources and drinking water.

Ex. 6 Personal Privacy (PP)

Do not allow this to go through. Unless you all are willing to drink the potentially at risk water that is subject to contamination by this would be effort. It reminds me of a scene from the Erin brokovich film where the folks from PG&E were given the water they sweared was not contaminated in mediation to drink but once that little detail was mentioned, nobody wanted to touch let alone drink the water.

Ex. 6 Personal Privacy (PP)

I strongly oppose injecting, any material, into or around any aquifers. Particularly waste materials from uranium clean up projects. I request public hearings on this issue before any funds are diverted to those ends.

Ex. 6 Personal Privacy (PP)

I vehemently oppose the release of the waste from uranium mining into the SD aquifer. Providing an exemption for such action endangers the water supply and public health. I urge the EPA to refuse the requested. permission.

Ex. 6 Personal Privacy (PP)

I believe this proposal is reckless. I understand there are monitoring for ground water, but there are never any guarantees the water won't get contaminated. I am sad that protecting the environment seems to no longer be the focus of the EPA. I hope you do the right thing here and reject this proposal.

Ex. 6 Personal Privacy (PP)

No uranium near aquifers, anywhere and certainly not in SD.

Ex. 6 Personal Privacy (PP)

Given that the injection wells for these draft permits are occurring IN an aquifer, it would seem obvious that no matter what precautions the applicant has indicated, they will not be sufficient enough to prevent these aquifers and waterways from being polluted with nuclear and toxic wastes. I again state my objection to these draft permits being approved.

Ex. 6 Personal Privacy (PP)

I'll keep this simple. Don't do anything to contaminate the aquifer in South Dakota. Nevada's water issues with surface level fallout is bad enough.

Ex. 6 Personal Privacy (PP)

Subject: Mine waste injection in aquifer

The words in the subject line for this message should never be found in the same sentence!!!

Of course it is wrong to put mine waste, which is usually a higher concentration of natural materials, into any area from which water is drawn for use by humans and animals! I am disgusted that our federal agency that is tasked with protecting our natural environment would consider a course of action that endangers our most precious resource, potable water. It is irresponsible to poison, or threaten any aquifer. Please do not allow this proposal to be permitted. Those who produce these waste materials need to devise better methods of disposal.

Ex. 6 Personal Privacy (PP)

I am writing this email to express my concern for the proposed uranium mining project in southwestern South Dakota. My concerns are mainly for future generations and the of course the environment. Coming from both a scientific background and from an Indigenous background, I urge you to deny this project in whole. Seeing and living the long term effects of uranium mining in my own community as well as on my reservation, I have seen and experienced all the negative impacts uranium mining has on both people that live in close proximity as well as the environment surrounding the mines. I personally seen the destruction to the land, the air and especially the water. My research is focused on finding a solution to the water contamination by uranium, arsenic, sulfates and a number of other metals/elements of concern. Uranium chemistry is very complicated and it is difficult to imagine the environmental impacts by this proposed project. Though I feel optimistic that we are closer to solving a portion of the

problem, it will cost more to remediate a contaminated sites in the future which is inevitable. I am deeply saddened of this news and I sincerely hope that this project is not allowed to move forward. Ex. 6 Personal Privacy (PP)

I can't get on the USGS site to find the geologic maps of the relevant area; however, can you please comment on the potential for connectedness between the proposed injections into the Minnelusa Formation and the Madison formation which provides a prolific source of clean drinking water for the nearby City of Gillette Ex. 6 Personal Privacy (PP)

Without doing a thorough assessment of the draft permits, just the concept of any exemption on aquifer requirements for Uranium mining seems crazy! As far as the details of the regulations I hope they are based on solid science and the need to protect our environment (and especially drinking water) from long term hazardous contamination, but not knee jerk "anti-nuke" sentiments. In the past I've trusted the EPA to make sure judgements, hopefully this is still the case.

Ex. 6 Personal Privacy (PP)

It is time to stop injecting poisons into our earth for the sole purpose of a business venture to extract minerals for profits. The future cost of poisoning aquifers is beyond calculation. Once injected, those poisons are at the mercy of geologic forces which humans cannot control and will eventually contaminate clean water. The benefit to one business enterprise is simply not the risk to the human race, the plants, the animals, the water and the air. No method of containment can insure protection. The simple answer is "NO MORE POISON SHALL BE INJECTED INTO THE EARTH."

Ex. 6 Personal Privacy (PP)

Absolutely no exemptions for groundwater contamination, whether from uranium, or any other foreign (non-H2O) substance. We (U.S. EPA) must prohibit any contamination of water, whether they are ground water or surface waters. <https://www.epa.gov/newsreleases/epa-seeks-public-comment-draft-permits-and-aquifer-exemption-uranium-mining-project>

Ex. 6 Personal Privacy (PP)

Are you people out of your goddamn minds? No it is not okay to dump that kind of waste into an aquifer that people use to wash their clothes, cook their food, brush their teeth and serve to their families. Ex. 6 Personal Privacy (PP)

I'm writing to oppose the Underground Injection Control permits to Powertech as well as the aquifer exemption. I'm relatively new to this concept and am no environmental scientist - but is injecting uranium recovery waste near a source of drinking water common practice? Seems like a really bad idea. And the request for exemption from the Safe Drinking Water Act suggests that Powertech thinks it may not work out so well, too. Please don't approve this. Ex. 6 Personal Privacy (PP)

And the International Physicians for the Prevention of Nuclear War passed a resolution in 2010 <<http://www.ippnw.org/pdf/2010-resolution-uranium-ban.pdf>> calling for a ban on all uranium mining worldwide, which states that "As well as the direct health effects from contamination of the water, the immense water consumption in mining regions is environmentally and economically damaging – and in turn detrimental for human health. The extraction of water leads to a reduction of the groundwater table and thereby to desertification; plants and animals die, the traditional subsistence of the inhabitants is eliminated, the existence of whole cultures are threatened." America's "Secret Fukushima": Uranium Mining is Poisoning the Bread Basket of the World By Margaret Flowers <<http://www.globalresearch.ca/author/margaret-flowers>> and Kevin Zeese <<http://www.globalresearch.ca/author/kevin-zeese>> Global Research, June 07, 2013 Ex. 6 Personal Privacy (PP)

Have you lost your minds? If your goal is to poison the citizenry, I suppose depositing these materials into an aquifer would be a good way to accomplish that. Do you know what an aquifer is? Do you know that ground water from many sources ultimately reaches and recharges aquifers? In the South Dakota region, almost everyone I know drills deep wells into aquifers for drinking water.

Question 1: precisely what is the identity of the designated aquifer?

Question 2: what makes you think any aquifer can be protected from any material that might be deposited into the ground?

Definitely oppose this plan. Ex. 6 Personal Privacy (PP)

Please deny the permits for injection activities related to the proposed uranium recovery project in the southern Black Hills region in Custer and Fall River Counties of South Dakota. Please do not allow uranium mining waste disposal in the South Dakota aquifer.

Ex. 6 Personal Privacy (PP)

I read an article that stated the EPA is potentially approving uranium mining waste to be injected into an aquifer which contains drinking water. This is one of the most absurd things that I've ever heard. This is a topic that even Commedia dell'arte would think too odd to even be considered in comedy. Uranium eventually (over a very long term) degrades into lead. Do you remember what happened with Flint, MI? I know that Pruitt is in charge of the EPA now, but have a backbone and say no. Or, make him drink that water after waste injection. Seriously, who thinks that this is a good idea? Is it worth it for someone to rape the earth for their own profit?

Ex. 6 Personal Privacy (PP)

I am taking the time to voice my opinion that underground injection should NOT be allowed. Water is precious and the continuing pollution of our aquifers by corporations is criminal. This practice affects all of us and we have a right to be protected from harmful acts of a few. Please deny this practice, protect water because none of us can survive without it!

Ex. 6 Personal Privacy (PP)

I am writing to strongly oppose injecting uranium mining waste into an aquifer! I oppose the aquifer exemption. People depend on clean water for life! Until this current administration, the EPA mandate was to protect the environment, not pollute it. Please reconsider.

Ex. 6 Personal Privacy (PP)

I am opposed to the extraction of Uranium in South Dakota. If Ivanka Trump is going to drink the test water in front of a live audience, I might be convinced to change my mind. I would want her and her children to return weekly and drink and bathe in the water to prove it is safe. Write that into the agreements.

Ex. 6 Personal Privacy (PP)

This is without a doubt the worst idea ever! You put scores of thousands of people at risk without clean drinking water. The contamination of those aquifers will result in another Chernobyl in human loss. Please do not grant exemptions.

Ex. 6 Personal Privacy (PP)

RE: EPA has issued two draft Underground Injection Control (UIC) Area Permits to Powertech (USA) Inc., for injection activities related to a proposed uranium recovery project in the southern Black Hills region in Custer and Fall River Counties of South Dakota.

I am writing as a concerned citizen regarding the recently announced application for exemption from what can only be called sensible guidelines for the protecting of a water aquifer. The potential for water contamination by uranium must be taken very seriously, particularly given the long term threat posed to not just human life, but all life, such as the increased rates of cancers due to increases in mutation rates. As I am sure you know, this potential for environmental damage is exacerbated by the presence of nitrates, which are practically ubiquitous in just about every region of the US. I strongly urge the EPA, the guardians of our environment, not to approve such a blatantly dangerous exemption.

Ex. 6 Personal Privacy (PP)

My opinion - NO, Never this shouldn't even be a question. At what point would you think that an element that renders large swaths of land unlivable (plenty of examples to research) would be okay to dump into an underground aquifer where most people are probably living on well water. Just to reiterate my answer is NO.

Ex. 6 Personal Privacy (PP)

I strenuously object to the exemption requested by the uranium mining company to permit uranium mining waste disposal in a SD aquifer. Aquifers are pristine sources of water, and contamination cannot be reversed.. The regulations already in place to prohibit this need to be followed. Our health takes priority over the financial interests of this company.

Ex. 6 Personal Privacy (PP)

Water is quickly becoming our most valuable natural resource. The potential damage to the aquifer will be irreparable.

Ex. 6 Personal Privacy (PP)

This activity will poison the water supply. People cannot live without clean water. I oppose granting these permits.

Ex. 6 Personal Privacy (PP)

The EPA must not allow Uranium mining waste to be disposed of in a South Dakota aquifer, or any aquifer for that matter. We cannot risk the further contamination of our underground water systems. Ex. 6 Personal Privacy (PP)

Please don't allow uranium waste to be injected into the aquifer. Don't we have enough environmental problems already? Isn't it bad enough that Scott Pruitt is now head of the EPA? Ex. 6 Personal Privacy (PP)

No it's not OK to dispose of uranium in an aquifer - in South Dakota or anywhere else. That is our water. Ex. 6 Personal Privacy (PP)

I think the job of EPA is to protect aquifers, not provide exemptions to companies that want to extract hazardous substances near water supplies. This is a continuation down the path of environmental degradation and a lack of concern for local drinking water. Please don't issue the permits. Ex. 6 Personal Privacy (PP)

I am a member of the public who would like to comment on the proposed permits for injecting uranium into the ground near a SD aquifer. This is an extremely and astonishingly bad idea. I understand that the uranium would be ostensibly treated to be made safe before injection. Still: no. Really, adamantly, no. I understand that the water would be monitored for safety throughout the process. Still: no. Completely and emphatically no. What happens when the water in the aquifer is found to be contaminated? How long would the remediation process take, if it's even possible? I understand that you are an actual person showing up for work every day, just like me, and I appreciate that at times like this, it is probably a mostly thankless job. I can only hope that opposing opinions to this idea, like mine, are genuinely counted and can have an impact in stopping this harebrained proposal. You would indeed be thanked for advocating for the public who is contacting you with our concerns. Ex. 6 Personal Privacy (PP)

Are they insane? Let's pollute the aquifer that drinking water comes from? Ummmm no way. Ex. 6 Personal Privacy (PP)

I can't even begin to express how vehemently I oppose allowing uranium mining waste to go into an aquifer in the black hills. Obviously, no aquifer should be abused in this manner, but having grown up in Spearfish, SD, the idea sickens me that much more. Please don't let this happen! Ex. 6 Personal Privacy (PP)

Allowing this into a South Dakota aquifer -- or into groundwater anywhere is pure insanity. Poisoning the earth to enrich extractive industries should be punishable by jail. Think, EPA, think! Ex. 6 Personal Privacy (PP)

I am writing to comment on this proposal. I am a tax paying citizen who works hard as does my husband to provide a safe living environment for our children to grow. It is not much of a stretch to infer that there are thousands of others just like us in the area where you propose to inject radioactive waste near the fresh water aquifers. Yes, I know the mines are required to treat the waste & continue to monitor it after its disposal, but that is absolutely unacceptable. Absolutely, 100% UNACCEPTABLE. The material in question will certainly impact the groundwater as well as all the living things in the immediate area. Ex. 6 Personal Privacy (PP)

I believe that there should be no Uranium mining waste injected anywhere near a aquifer. Bad idea! Don't do it.

Ex. 6 Personal Privacy (PP)

I just wanted to express my opinion on the above subject. I think it would be a horrible idea with an adverse impact on the ground water. I also believe it would be detrimental to the environment of Black Hills. Please do not permit this and thank you for being interested in the public's opinion. Ex. 6 Personal Privacy (PP)

EPA asks public for permission to allow Uranium mining waste disposal in SD aquifer: No. Must abide by regulations, and ideally common sense. Ex. 6 Personal Privacy (PP)

Please do not permit Powertech an exemption to dump uranium into the aquifer system in South Dakota. Water sources must be protected from contamination. Ex. 6 Personal Privacy (PP)

I've read about the draft Powertech permits, and urge you to stop both. Water safety must be one of three EPA's highest priorities. Reject these permits, please.

### Ex. 6 Personal Privacy (PP)

Please don't destroy the aquifer in South Dakota with uranium mining waste disposal.

### Ex. 6 Personal Privacy (PP)

I am writing to oppose the proposal to allow infection of waste products from uranium mining near underground aquifers in South Dakota. This proposal is dangerous and threatens clean drinking water for a large number of people. The benefit from the proposal is negligible.

### Ex. 6 Personal Privacy (PP)

I would like to voice my opposition to the draft permits and proposed aquifer exemption associated with the work to be done by Powertech, Inc. Further, I would oppose any work that threatens to contaminate our aquifers or otherwise alter them from their natural state.

### Ex. 6 Personal Privacy (PP)

Does this paragraph actually state that despite the comments about treating the water in the preceding paragraph that you are requesting an exemption from treating it?

What waste products are in this water? And who owns these uranium recovery mines?

"EPA is also proposing an aquifer exemption approval in connection with the draft UIC Class III Area Permit. Specifically, this approval would exempt the uranium-bearing portions of the Inyan Kara Group aquifers from protection under the Safe Drinking Water Act. Such an exemption must be in place before ISR activities within these aquifers can occur."

Thank you for answering my questions. Ex. 6 Personal Privacy (PP)

### Ex. 6 Personal Privacy (PP)

I oppose the allowance of these mining permits, as they endanger the drinking water in nearby areas, as well as intrudes on Indigenous-owned spaces.

### Ex. 6 Personal Privacy (PP)

I am writing to register my opposition to the granting of permits and exemptions to the Safe Drinking Water Act for Powertech's proposed uranium mining in South Dakota.

The Safe Drinking Water Act is a crucial means of protecting an irreplaceable resource used by local tribes and other residents. Granting exemptions to this Act so that a private company can reap financial rewards is wrong. There is NO safe amount of uranium that can be injected into an aquifer.

i call upon the EPA to do its job in protecting the environment and its inhabitants.

Do NOT GRANT this permit and exemption.

### Ex. 6 Personal Privacy (PP)

No radioactive material must be allowed into our aquifer at any time. Ever. Radioactive material is hazardous to all life forms. This is an abomination. NO. NO. NO. That is my input as a member of the public. Once again: NO.

**Ex. 6 Personal Privacy (PP)**

No permits, exceptions whatever! Water is life. I was alive during the time of the Times Beach Dioxin pollution, EXXON MOBIL Valdez and Deep Horizon. I also am a student of the problem with Chevron extracting oil, Etc in the previously pristine Ecuadorian Forest 30 years ago and leaving those poor natives with a mess from that process. The natives of had an ongoing legal dispute to get remedies for 25 years!!! Please stop insulting our intelligence!! I am a retired RN I have a BSN from major University and I practiced in Healthcare Management for 30 years. Don't reinvent the wheel. Healthcare has proven that PREVENTION is a million times better than trying to treat the disease once you get it.

Don't let these big companies make profit by destroying our public resources such as water in the aquifers and above ground on the land and in the water and the air. What don't you get? Your grandchildren and great-grandchildren are going to be around during this time in the future and they'll be the ones having to deal with this if we don't stop it

before it starts. You cannot eat, drink and breathe CASH \$ \$ \$ \$ \$ . Do you not remember the rivers being on fire back in the sixties and seventies and the Erie Lake almost being dead from pollution? REMEMBER SMOG????? Ex. 6 Personal Privacy (PP)

**Ex. 6 Personal Privacy (PP)**

I am concerned that permitting uranium extraction and allowing ANYTHING from this process to be put into a clean water supply will contaminate it and make it dangerous for people to drink. Water is becoming scarce and we must keep what we have safe and protect it from dirty industries. I and many other environmentalists will be extremely disappointed if you allow this to occur.

Ex. 6 Personal Privacy (PP)



Per the EPA request for public comments on this permitting process for this project:

The risks to the aquifer for a private corporate enterprise are too high risk to be permitted.

If the aquifer is contaminated there is no method to remove the damage. As water is required for public consumption and agriculture uses that also evolve into public consumption this is an unacceptable risk. This new mining scheme provides no benefit to the local or regional community but poses a significant and permanent risk to the water system and environment of the region in question in western South Dakota. Ex. 6 Personal Privacy (PP)

I absolutely oppose allowing Uranium mining waste disposal in SD aquifer. We must protect our environment. Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Please do not allow waste disposal in South Dakota's aquifer. That is ridiculous to consider contaminating the water supply with nuclear waste. Please stop!! Ex. 6 Personal Privacy (PP)

I strongly oppose the proposition to allow injection of "process waste fluids" into the Inyan Kara Group aquifer. I am not confident in the safety of such an action under ideal circumstances. Our current administration's lack of interest in environmental issues only deepens those concerns.

I am not comfortable with this action. The presence of monitoring is an admission that contamination can take place. If such contamination occurred, it would not be possible to thoroughly remove it. The aquifer would be tainted. Drinking water is one of our most valuable resources. There are already too many dangers facing our current sources.

Deliberately and consciously endangering these resources any further is simply ludicrous. The dangers are too real and too costly. This cannot be allowed to happen. Ex. 6 Personal Privacy (PP)

I am writing you to give you my opinion about dumping uranium waste from mining in South Dakota in aquifers. It would seem that common sense would answer this question for you and no poll would need to be taken. So I ask you this, would you drink a glass full of water with uranium mining waste in it? Would you give uranium waste to your children, or grandchildren to drink or wash in? Would you water your vegetable garden with it? Would you give it to your livestock? Would you eat meat, take eggs, or drink milk from livestock fed on uranium waste?

Water does not just sit idly and obediently by where you dump it, it seeps, moves, and goes where it wants. There is not a surface or substance on this planet it cannot wear its way through. What you are asking people for is permission to pollute drinking water for eternity for a few dollars in profit for corporate bosses, who don't have to drink the water they pollute.

The answer is no, don't do it. Don't exempt aquifers from the Clean Water Act. That you are even asking tells me you KNOW you will be polluting for generations to come, in which case, I say shame on you. Stand up for what is right here, for what is good, for what is best. Don't let corporate polluters make a disaster site for America. Don't kill people, don't give us cancer, don't hurt us.

It is the job of the government to protect and serve the people of this country. Dumping uranium waste into aquifers is counter to all that entails. Ex. 6 Personal Privacy (PP)

I'm responding to the EPA Region 8 draft proposals mentioned in <https://www.epa.gov/newsreleases/epa-seeks-public-comment-draft-permits-and-aquifer-exemption-uranium-mining-project>

I was particularly alarmed by the language that "EPA is also proposing an aquifer exemption approval in connection with the draft UIC Class III Area Permit. Specifically, this approval would exempt the uranium-bearing portions of the Inyan Kara Group aquifers from protection under the Safe Drinking Water Act. Such an exemption must be in place before ISR activities within these aquifers can occur."

As a citizen sympathetic to my fellow citizens pursuing such activities as "drinking and otherwise using water without it increasing the likelihood of cancer and poor health" I highly object to this exemption approval. If the Class III Area Permit is in an area vulnerable enough to require such review, then such review is a vital part of the process and should not be simply discarded out of convenience. Ex. 6 Personal Privacy (PP)

Please don't dump waste where people get their drinking water. This could hurt our environment or kill someone and bring about preventable suffering. It's supremely irresponsible and shortsighted. This kind of treatment of our water and

lands makes the United States look barbaric and ignorant. I don't support these draft permits and exemptions.

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

## **@@Concerns for impacts to Native Americans/the sacred Black Hills**

If you can send me any information pertaining to any activities on Treaty Territory of 1851 and 1868 Fort Laramie Treaties.

I understand there is some activity with uranium mining.

I also request that you make me part of the notification list for tribes. Our organization is chartered by the Rosebud Sioux Tribe to oversee treaty related issues and report back to our tribal council.

Thank You for any assistance. Ex. 6 Personal Privacy (PP)

**This is unacceptable. permits to mine uranium in the southern Black Hill should be denied! Putting poison water in to the ground should never be permitted .....The Black Hills, the heart of everything that is. The 1868 Fort Laramie Treaty was ratified by Congress and was never amended. Under international law it is Native land.** "The laws of the United States, the NRC regulations, and the individuals who sit behind those desks can honor treaty law, the life way of the Lakota, environmental laws, and demonstrate respect for Mother Earth by denying application to mine uranium." Ex. 6 Personal Privacy (PP)

Hello. I am writing to express my opposition to the Underground Injection Control (UIC) Draft Area Permits and one associated proposed aquifer exemption decision for the Dewey-Burdock uranium in-situ recovery (ISR) site located near Edgemont, South Dakota. These aquifers belong by treaty to the Lakota Sioux people, who have been working toward the return of their ancestral lands. It is a matter of moral outrage that the lands were taken to begin with; poisoning the water there with mining waste which is inevitably left after "restoration" is unacceptable. Thank you for your time and attention to this matter. Ex. 6 Personal Privacy (PP)

No uranium mining in the Black Hills. Uranium mining of the Black Hills is an assault on Native sovereignty, and an environmental disaster in and of itself, even if it goes as planned. Please do not allow this to happen. Please respect this important religious, cultural and historical site. Ex. 6 Personal Privacy (PP)

I was told the reason you scheduled a meeting in Valentine on April 27, 2017 at Niabrara Lodge is so the two reservations in South Dakota would have a place to comment. It isn't going to happen. If you truly want comments from the two reservations, you will have to hold them on the reservations. Contrarily, to public knowledge, the reservations have modern hotels and large public meeting places on the reservations. In fact, Rosebud has a very modern hotel and meeting rooms, just twelve miles north of Valentine at the state line of South Dakota. Because they are not welcome in Valentine, unless they come in the daytime to spend their money. Yes, discrimination is alive and well in the United States, before Trump started spewing his hate on us. Ex. 6 Personal Privacy (PP)

There should not be any mining in the Black Hills. US Treaty clearly states this is Native land. A Sovereign Nation Ex. 6 Personal Privacy (PP)

Please do not continue with these draft permits and aquifer exemption for uranium mining in the Black Hills. These are the tribes land. All protections should be done to protect these lands and water from ever having any mining on them. It is not necessary. Why should any exemptions be made?. This land is owned by the tribes and should be treated just like any other private land. The water should be protected from contaminants at all cost. No mining should be allowed. Mining in and of itself is not a guarantee of safe clean water no matter how many precautions are made. I am against any mining permits or aquifer exemptions for uranium mining in the Black Hills or anywhere. Ex. 6 Personal Privacy (PP)

Uranium mining of the Black Hills is not only an assault on Native sovereignty over a religious, cultural, and historic site for many Nations, but uranium mining is an environmental disaster itself, even if it all goes as intended. Ex. 6 Personal Privacy (PP)

Please be advised that I am hereby submitting my comments regarding the draft permits on Dewey-Burdock insitu mining.

An enrolled member of the Standing Rock Sioux Tribe, I disagree with any mining on our treaty lands, and jeopardizing the aquifers from which the Great Sioux Nation (Oceti Sakowin) receives drinking water. For your information the Oceti Sakowin is made up of seven councils of recent history. .

I do not want any further degradation of our waters encompassing current tribal needs, namely the Pine Ridge, Cheyenne River, Standing Rock, Rosebud, Lower Brule, Crow Cree, Sisseton-Wahpeton, and Santee Sioux, Flandreau, and Yankton reservation lands and waters.

I do not want any other peoples health jeopardized as well, i.e. all of the South Dakota, North Dakota, Montana, Wyoming, and Nebraska states populations.

Ex. 6 Personal Privacy (PP)

"Specifically, this approval would exempt the uranium-bearing portions of the Inyan Kara Group aquifers from protection under the Safe Drinking Water Act. Under its obligation to comply with the National Historic Preservation Act and under EPA's Tribal Policy on Consultation and Coordination with Indian Tribes, EPA has been consulting and coordinating with several interested Tribes to identify the potential effects of the proposed project on traditional cultural places, historic and sacred sites."

- these are your own words in the press release and it should answer the question.. Please!!! Leave Native Lands Alone!!! haven't we given them the short end of the stick enough?!

Ex. 6 Personal Privacy (PP)

This is court sanctioned murder of the native people in Black hills. You have stolen their children, taken their land and now you are polluting their water.

Ex. 6 Personal Privacy (PP)

I am writing to oppose the plan to dump wastes from uranium mining under the aquifer in S. D. This is not wise from many standpoints. Once again our Native American tribes are threatened with a real risk to their drinking water. *Barbara Churray*

NO! Leave the sacred Black Hills alone.

Ex. 6 Personal Privacy (PP)

All responsible Americans must oppose additional uranium mining in South Dakota, especially injection mining. The United States has already polluted hundreds of thousands of acres of Indian land, hundreds of miles of waterways, and the air and wind above them. Not only cattle, but also wildlife and HUMAN BEINGS drink the polluted waters and suffer illness and death as a result.

I urge the EPA to deny these mining permits being applied for.

Ex. 6 Personal Privacy (PP)

I oppose the allowance of these mining permits, as they endanger the drinking water in nearby areas, as well as intrudes on Indigenous-owned spaces.

Ex. 6 Personal Privacy (PP)

I belong to the Intelligentsia. The half life of uranium is 4.5 billion years! You cannot bribe us with short-term job security!!! The white men from Europe have already stolen the whole of America from the original Aborigines who lived here and almost committed genocide on their population. Now you want to go and commit more pollution and ravage their land so it's uninhabitable forever. Have you no conscience?? Even considering this proposal is absurd.

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

It is my understanding that the EPA has issued two draft Underground Injection Control (UIC) Area Permits to Powertech (USA) Inc., for injection activities related to a proposed uranium recovery project in the southern Black Hills region in Custer and Fall River Counties of South Dakota. I strongly urge you to reconsider any decision to allow permits to mine any region that impacts Native American lives. We all know how Native Americans are considered second class citizens in this country; how their lands are up for grabs; and how their health is not as important as expanding drilling for oil, uranium, copper and so on. These substances are not for consumption here (not that this would be acceptable) but to enrich the companies that sell them overseas. Please do not continue to perpetuate these injustices and do not approve any draft permits or any aquifer exemption.

Ex. 6 Personal Privacy (PP)

The proponents of this action love nowhere around such toxins & frankly do not care who is affected... especially since the residents are Indians, poor, & sorely disenfranchised, & poorly educated for the most part. This proposal is a disgrace to the country & evidences a deep disregard for the citizens in general, not just the Black Hills residents.

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

## **@@Concerns about uranium ISR**

"Current uranium mines have a history of noncompliance

<<http://www.earthworksaction.org/files/publications/Nuclear-Power-Other-Tragedy-low.pdf>> with regulations. There continue to be spills. Mining corporations do not clean up areas that they are required to clean up. They do not pay fines. And they influence local governments to loosen requirements once they receive a mining permit.

In addition to contamination of land, air and water, uranium mining, particularly in situ mining requires large amounts of water. In the current environment with extended droughts and reduced aquifers, in situ mining places greater strain on the water crisis.

Ex. 6 Personal Privacy (PP)

## **@@Against uranium mining in general**

The mines for uranium have been [unreadable] an environmental disaster. These will be, too.

Ex. 6 Personal Privacy (PP)

Uranium has no good place in our future – it is a failed industry – do not mess with it!!!

Ex. 6 Personal Privacy (PP)

Mark me in as opposed. We have more than enough uranium stored and we should never have let the Clinton's sale 20% of our supply to the Russians. Is this permit being issued to a foreign entity? Shame on the EPA! I hope President Trump drastically reduces the EPA!!!

Ex. 6 Personal Privacy (PP)

I oppose the draft permits and aquifer exemption for uranium mining in southwestern South Dakota. These are our public lands and uranium mining should not sully our national treasures. I wholeheartedly oppose any such mining on our public lands.

Ex. 6 Personal Privacy (PP)

## **@@Concerns about effects of past uranium mining**

Dewey-Burdock is on private land owned by ranchers who distrust the government and the EPA, so has never been properly checked for contamination or cleaned up.

Ex. 6 Personal Privacy (PP)

I live in Grants, New Mexico, the former self proclaimed "Uranium Capital of the World". As a now retired RN, I can tell you of the many deleterious effects of Uranium Waste. Years after closure of the mines here we are still dealing with illnesses and deaths from uranium, and the water and environment are still not cleaned up, and won't be. Allowing uranium mining waste disposal in a SD aquifer is an absolutely horrible idea unless you believe is a good thing to poison people, give people cancer...please, NO.

Ex. 6 Personal Privacy (PP)

I am writing to OPPOSE approval of the permits that would allow "injection wells for the in-situ recovery (ISR) of uranium in the Inyan Kara Group aquifers and ... deep injection wells that would be used to dispose of ISR process waste fluids into the Minnelusa Formation below the Inyan Kara after treatment. Under the terms of the draft permits, waste injected under the Class V permit must be treated prior to being injected and must meet all radioactive waste and hazardous waste standards. Monitoring of the underground sources of drinking water surrounding the Class III injection wellfields will take place before, during and after ISR operations to ensure the underground sources of drinking water are protected."

"EPA is also proposing an aquifer exemption approval in connection with the draft UIC Class III Area Permit. Specifically, this approval would exempt the uranium-bearing portions of the Inyan Kara Group aquifers from protection under the Safe Drinking Water Act. Such an exemption must be in place before ISR activities within these aquifers can occur." -- News Release from EPA Region 8

Anyone who is familiar with South Dakota's recent history knows that uranium mining has caused radiation poisoning on the Pine Ridge Indian Reservation since at least the 1960s. The Cheyenne River that runs through the reservation is dotted with radiation warning signs that say "Caution – Nuclear Radioactive River." The uranium waste has not been cleaned up from the last spate of uranium mining. Why should the EPA permit this again? Uranium tailings and wastes pose a significant health risk for thousands of years into the future.

*Today, key water supplies dotting the Pine Ridge reservation carry arsenic, alpha radiation and other contaminant levels up to 18 times the legal limit, according to water tests conducted by Energy Laboratory, an independent, EPA-certified*

analytical laboratory in Rapid City, S.D. Fifty-eight percent of the private wells, springs and soils tested on Pine Ridge in June and July 2009 showed positive results for contamination by arsenic, lead and/or various forms of radiation. Local wells that tap into the Inyan Kara aquifer already have levels of alpha radiation above the EPA's Maximum Contaminant Level. "The portion of the Cheyenne River Basin that lies in southwestern South Dakota drains about 16,500 square miles within the boundaries of the state. The area in this basin includes part of the Black Hills and Badlands, rangeland, irrigated cropland, and mining areas. After traversing the western half of the state from southwest to northeast, the Cheyenne River flows into Lake Oahe, a reservoir on the Missouri River.

"Previous efforts remove the radiation in the water at Red Shirt have been unsuccessful. Drinking water is piped in, or residents must drive 25 miles to the little town of Hermosa to buy water. The Cheyenne River has dried up approximately one mile from Red Shirt and tests of the river bottom soil by Defenders of the Black Hills are pending. Initial tests using a Geiger counter revealed more than double the amount of normal background elevations for radiation." Uranium Mining Poisons Native Americans, article by Jeff Gerritsen, 25 Feb 2009.

<http://www.culturechange.org/cms/content/view/336/65/>

I reproduce below the Fact Sheet prepared by Charmaine White Face in 2006.

Uranium Mining and Nuclear Pollution in the Upper Midwest: F A C T S H E E T America's Secret Chernobyl  
By Charmaine White Face, Coordinator  
Defenders of the Black Hills

1. Uranium mining in South Dakota, Wyoming, Montana, and North Dakota began in the middle of the 1960s. World War II, which ended with the nuclear bomb, introduced the use of nuclear energy for the production of electricity and caused the price of uranium to rise. As the economy of the Midwestern states depends primarily on agriculture, when uranium was discovered in the region, many get-rich-quick schemes were adopted. Not only were large mining companies pushing off the tops of bluffs and buttes, but small individual ranchers were also digging in their pastures for the radioactive metal. Mining occurred on both public and private land, although the Great Sioux Nation still maintains a claim to the area through the Fort Laramie Treaties of 1851 and 1868.
2. In northwestern South Dakota, for example, the Cave Hills area is managed by the US Forest Service. The area currently contains 89 abandoned open-pit uranium mines. Studies by the USFS show that one mine alone has 1400 mR/hr of exposed radiation, a level of radiation that is 120,000 times higher than normal background of 100 mR/yr. There are no warning signs posted for the general public anywhere near this site! It is estimated that more than 1,000 open-pit uranium mines and prospects can be found in the four state region from a map developed by the US Forest Service.
3. The water runoff from the Cave Hills abandoned uranium mines empties into the Grand River which flows through the Standing Rock Indian Reservation. Three villages are located on the Grand River and their residents have used the water for drinking and other domestic purposes for generations. One village still uses the water for drinking and domestic purposes. The water runoff from the Slim Buttes abandoned uranium mines empty into the Moreau River which flows through the Cheyenne River Indian Reservation. Four villages are located on the Moreau River; however no data is currently available about their use of the Moreau River water. Both of these rivers empty into the Missouri River which empties into the Mississippi River.
4. The following agencies are aware of these abandoned uranium mines and prospects: US Forest Service, US Environmental Protection Agency, US Bureau of Land Management, SD Department of Environment and Natural Resources, the Bureau of Indian Affairs and the US Indian Health Service. Only after public concern about these mines was raised two years ago did the USFS and the EPA pay for a study of one mine this year, 2006.
5. In Southwestern South Dakota, the southern Black Hills also contain many abandoned uranium mines. Nuclear radiation near Edgemont, SD, has already polluted the underground water of the Pine Ridge Indian Reservation according to a study completed in 1980 by Women of All Red Nations. The US Air Force also used small nuclear power plants in their remote radar stations and missile silos which number in the hundreds in this four State region. No data is available on the current status or disposal of these small nuclear power sources.
6. More than 7,000 exploration holes for uranium have been drilled in the southwestern and northwestern Black Hills. More are being planned in Wyoming. These holes go to depths of 800 feet. The exploratory process itself allows radioactive pollutants to contaminate underground water sources. South Dakota currently has no regulations for In Situ Leach mining of uranium.
7. In Wyoming, hundreds of abandoned open-pit uranium mines and prospects can be found in or near the coal in the Powder River Basin. Yet plans are being made to ship more of that coal to power plants in the Eastern part of the United States. Radioactive dust and particles will be released into the air at the power plants as well as locally in the strip mining process. Federal tax dollars totaling more than \$2.3 billion dollars as a loan are planned to be given to a private business,

*the Dakota, Minnesota and Eastern Railroad, to increase the amount of coal hauled to the power plants. Two other railroads currently haul coal out of this area.*

*8. In 1972, President Richard Nixon signed a secret Executive Order declaring this four State region to be a 'National Sacrifice Area' for the mining and production of uranium and nuclear energy. This is the same area of the 1868 Fort Laramie Treaty territory, the final home of the Great Sioux Nation.*

Ex. 6 Personal Privacy (PP)

How about NOT approving the mining of uranium? How about NOT approving an exemption allowing toxic wastewater to be injected into an aquifer? We already know how toxic uranium mining can be; I am from New Mexico, and am quite familiar with cases where people bodies and homes are forever contaminated by mining operations, so my vote is that we don't do that anymore.

Ex. 6 Personal Privacy (PP)

Western South Dakota knows all too well what happens when a uranium mining enterprise abruptly fails. This is how the current uranium mining mess left in the state was created. We should learn from past mistakes rather than hoping another company coming in won't do the same thing.

Ex. 6 Personal Privacy (PP)

## **@@Concerns about hydrofracking**

Injection wells like the one being proposed here have caused many problems in areas like Oklahoma over the last few years. The United States Geological Survey data shows that between 1978 and 2008 there were no more than 3 earthquakes per year with a magnitude of 3.0 or greater in Oklahoma. With the proliferation of fracking, the number of earthquake with a magnitude of 2.0 was 585, 887, and 639 for the years 2014-2016. The impact of these earthquakes is borne by citizens who suffer property damage and businesses who lose revenue while they recover.

Ex. 6 Personal Privacy (PP)

I do not support these draft permits. In one regard, the energy sector has apparently learned nothing from the geological destabilization that has occurred in Oklahoma and other locations that have allowed injection wells as part of fracking activities. Additionally, there are no studies or details indicating what has actually BEEN placed into injection wells. However, we do know that earthquakes have occurred and toxic materials have appeared in the water sources after these injection wells have been allowed.

Ex. 6 Personal Privacy (PP)

USGS FINALLY ADMITS THAT FRACKING CAUSES EARTHQUAKES

NO, I SAY A THOUSAND TIMES NO! NO FRACKING TYPE ACTIVITY! PERIOD!

Underground Injection Control

Powertech (USA) Inc., for injection activities related to a proposed uranium recovery project in the southern Black Hills region in Custer and Fall River Counties of South Dakota. NOT- BIGLY!!

Ex. 6 Personal Privacy (PP)

## **@@Concerns about the price of uranium and nuclear energy**

There are also serious concerns about the company potentially cutting corners or abandoning the project. The price of uranium has been extremely low since the Fukushima nuclear disaster. With new problems that have since developed in the nuclear power industry the price for uranium will never recover. This could lead to a number of bad business decisions on the part of the mining company or an abrupt abandonment of the site when the business factors become too unfavorable or the company goes bankrupt. Currently Toshiba-Westinghouse has decided to permanently cease new reactor builds, is considering bankruptcy and could potentially default or abandon the current new US reactors under construction.

Areva is in a similar situation as Toshiba-Westinghouse and would be unlikely to pursue any new reactor builds if they survive their current financial problems. This is all extremely relevant when considering what is permissible risk by a highly unstable private enterprise.

Ex. 6 Personal Privacy (PP)

## **@@Seems contrary to EPA's mission**

I find this shocking. No, the uranium bearing portions of the Inyan Kara Group aquifers SHOULD NOT BE EXEMPT from protection under the Safe Drinking Water Act. What in the world is going on? Please, do your job and protect our drinking water. Ex. 6 Personal Privacy (PP)

I am strongly against this measure. It violates everything the EPA stands for. I can only assume you are doing this because of the current president. Stand up and have a spine. Ex. 6 Personal Privacy (PP)

What is this office doing to us? Would you want your children living near there? I wouldn't allow my children to live anywhere near there.

It's plain insane. The EPA is supposed to protect us, not side with big billionaires.

"EPA asks public for permission to allow Uranium mining waste disposal in SD aquifer." Ex. 6 Personal Privacy (PP)

Of course citizens are against allowing toxic waste dumping into our waterways. How can the government even ask? This is the primary reason for EPA. Stop irresponsible actions against our natural places and resources. This effects all people in the US. Ex. 6 Personal Privacy (PP)

I would like to comment on exemption request to inject uranium-bearing waste water into Inyan Kara Group aquifers from protection under the Safe Drinking Water Act. I object and wonder how can this even be considered. What in the world is going on with EPAULETS to even consider this. Ex. 6 Personal Privacy (PP)

I am writing to you as a believer in the epas mission BEFORE your new boss ever stepped in the building. And that is to provide quality control on the environment and to protect us, the citizens of this country from corporations and their profits over my health and neighbors well being.

It doesn't take a rocket scientist to understand the implications of what is being sought after. Your job is to preserve the land for generations to come. Including the natural inhabitants of a given area. Human, or wildlife. We are all inhabitants of this earth and we are demanding that obvious dangers are unavoidable and cannot be maintained by humans should something go awry. And save the retort about the safe guards in place. We have seen time and time again that these "safeguards" are faulty by design or corners are cut to save time and money. Ex. 6 Personal Privacy (PP)

How can you even consider destroying an aquifer with uranium mining waste? It is inconceivable and appears to be in direct contradiction to the EPA mission to protect our water. Please, stop this kind of disgraceful catering to mining interests and protect our waters! Ex. 6 Personal Privacy (PP)

It's hard for me to believe that the EPA would for one moment consider it acceptable to allow uranium mining waste to be dumped in any aquifer. If the EPA is not our champion and our protection against pollution of our drinking water, the air we breathe, and the God given beauty of our natural environment, then what on earth is its function!?! Please do your job and do NOT allow the dumping of mining waste into the South Dakota aquifer, or any other act of pollution!

Ex. 6 Personal Privacy (PP)

Concerning the potential proposal of permits for uranium injection control into an aquifer, the US and the EPA should be PREVENTING this level of environmental damage to not only our drinking water, but the entire ecosystem. I would like to vehemently voice my opposition to this proposed draft permit. INj, but the water and other natural resources this area provides. It's irresponsible to knowingly allow this level of damage to occur, but it also goes against the very name of the EPA. How can you 'protect' an environment when you're proposing a permit that allows for disposing of waste fluids in the process of uranium mining.

It's astonishing to me that this permit has even pushed to draft stage. As an agency that is supposed to work for the people, for the environment and for the protection of natural resources, this flies in the face of all three.

I strongly urge the outright rejection of this proposed draft, as it could threaten human life and wildlife for potentially many decades to come. It's astonishing to me that the EPA has failed the American public this quickly. *Jeremy R Bunting*

The EPA has been held in high regard in generations past, and the American people trusted that our taxpayer funded EPA would protect our air, water and soil.



Clearly, the EPA has made poor decisions due to the political climate of late. But it is time to take our country back AND WE NEED YOU TO PROTECT US!

We are at a critical juncture environmentally, and hopefully we can trust you to make the hard decision to protect us from any and all uranium mining projects. You know the science--you know the truth. Please make the hard decision and do the right thing. Please protect the American Citizens from this terrifying move toward environmental destruction. Dr.

Ex. 6 Personal Privacy (PP)

I don't know how this could possibly be a good idea. I know that Secretary Pruitt wants to protect business interests over the environment, but that is not the role of the EPA! The agency was developed to PROTECT THE ENVIRONMENT.

I'd like to see the science saying this is a good idea and that ground water will not be affected. And if 98% of scientists say it's fine, I would expect Secretary Pruitt to use the same criteria he uses to evaluate scientific evidence for climate change to rule against this invasive action!

Ex. 6 Personal Privacy (PP)

Are you seriously considering this? I cannot believe the agency designed to protect the environment is actually asking civilians this question and not going to science...oh wait I forgot under Trump you can forget reality and be completely stupid!!

Ex. 6 Personal Privacy (PP)

So let me get this straight...the EPA, an agency specifically designed to protect the environment, is going to use an aquifer to dispose of "treated" radioactive waste. Seriously? No excuse. NONE I don't live in that area, but I am a human being, with a conscience. Do your jobs

Ex. 6 Personal Privacy (PP)

## **@@Concern about ability of EPA to monitor the activity**

NO IT IS NOT GOOD - you are unleashing the potential for another "Flynt, Michigan" debacle...and being the EPA is lead by someone who doesn't believe in CO2 emissions is actively helping climate change; Plus is planning on cutting 1/4 of the EPA's budget....NO - I can't trust the EPA to safely and effectively enforce the restrictions necessary to make the uranium retrieval safe. Ex. 6 Personal Privacy (PP)

I am concerned that the current administration's planned cuts to the EPA will result in insufficient funding and personnel to monitor these wells. Ex. 6 Personal Privacy (PP)

I am concerned that the current administration's planned cuts to the EPA will result in insufficient funding and personnel to monitor these wells. Ex. 6 Personal Privacy (PP)

How do we know if the EPA will properly monitor the treatment of this highly contaminated water if these misguided permits are issued when your Administrator has time and again shown that he sides with business interests first and American Public Health last? Ex. 6 Personal Privacy (PP)

As a US citizen, a mother of three US citizens, and a human, I vehemently object to allowing Powertech to dispose of ISR waste fluids into the Minnelusa Formation.

If this is allowed, despite what I expect will be huge public disapproval, then there should be no exemption of the uranium-bearing portions of the Inyan Kara Group aquifers from protection under the Safe Drinking Water Act. The news release on this says the waste must meet radioactive waste and hazardous waste standards, and monitoring will take place to make sure drinking water isn't protected. But in a time when the EPA's leader denies the effect of humans on climate change, effectively denying science, and when science and even the mention of science is under siege by the new administration, why in the (imperiled) world would I believe that anyone will actually hold anyone accountable or test anything?

I'm very concerned in general about the EPA's ability to do its mission, protecting the environment under the leadership of Pruitt. Reading about this particular issue didn't increase my confidence at all.

No, no, no, to allowing this company to dump its uranium, regardless of what supposed cleanup they will do to it or supposed monitoring testing that will make it "safe." Ex. 6 Personal Privacy (PP)

## @@Why did EPA take so long to issue these permits?

Below is my question and public comment on two Underground Injection Control (UIC) Draft Area Permits and one associated proposed aquifer exemption decision for the Dewey-Burdock uranium recovery project.

Question: You have had the permit applications for many years. Why has it taken so long to issue the draft permits? Comment: The relevant issues concerning environmental impacts were addressed by the USNRC in their EIS and source material license.

Ex. 6 Personal Privacy (PP)

## @@Concerns about seismic activity related to injection activity

I am amazed and genuinely disheartened to see that the EPA has allowed consideration of the Uzarga mining project in Fall River County, South Dakota. I have been an amateur geologist for many years and own a home in Hot Springs, SD. Knowing the complex nature of Black Hills geology, I find it appalling that you would consider injection well technology safe in an area directly adjacent to the Dewey and Jewel Cave fault zones and their direct connections to both the Barker Dome anticline and the Fanny Peak monocline. Considering what injection well technology has done to the relatively stable geology of Oklahoma and other states, I would think that special consideration would be given to an area that has already shown earthquake activity and that is so directly linked to water supplies throughout the southern Black Hills.

Ex. 6 Personal Privacy (PP)

ProPublica completed a review of more than 220,000 well inspections from October 2007 to October 2010, finding that structural failures were routine. More than 17,000 integrity violations were handed out and more than 7,000 of these wells were found to be leaking (<https://www.propublica.org/article/injection-wells-the-poison-beneath-us>). In addition, research has linked deep injection wells to local earthquakes. These earthquakes have the potential to cause damage to the wells and may also cause structural damage that will impact local populations.

Ex. 6 Personal Privacy (PP)

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Ex. 6 Personal Privacy (PP)

## @@Mistrust of Powertech fulfilling monitoring requirements

Who will be doing the monitoring of the water? The companies cannot and should not be trusted with this activity. We all know about companies who have historically not provided accurate information to the public when water has been contaminated. This withholding of information has resulted in serious illness or death for people who have been exposed to contaminated water.

Ex. 6 Personal Privacy (PP)

## @@Against nuclear power

I am opposed to the mining of uranium for nuclear power use. There has been many irresponsible decisions fueled by greed made by present American nuclear power plants; causing radioactive leaks, explosions, and even leaks in the waste disposal sites. Such accidents put the wellbeing of our country in jeopardy. Mining for more fuel for these types of plants will only cause more health issues in the future. Due to just one nuclear power plant mistake in Japan, scientists now believe all aquatic life will be extinct before 2050. Surely you don't want to have such future catastrophes on your hands by allowing access to more uranium. Thank you for taking the time to hear my concerns

Ex. 6 Personal Privacy (PP)

## @@Comments about plans for injection of toxic waste received from outside the Dewey-Burdock Area

Now we learn that there will be no uranium mining in the foreseeable future but rather the foreign company plans on accepting toxic wastes from outside the area to make their profits at the expense of local population and necessary

water supplies. Please. Please. Protect our environment from these profit mongers. Thank you for your time and consideration.

Ex. 6 Personal Privacy (PP)

## Not Related

I am very concerned about Pruitt denying climate science. The science is clear and we rely on the EPA for protecting our water, air, and land. We cannot rely on each state to clean up after themselves and not affect other states. We need federal regulation. Ex. 6 Personal Privacy (PP)

Thanks for your reply and everything you do to try to protect our environment. I know our Hawaii congress reps will do everything they can to not let the EPA be dismantled so it can continue its important work. Ex. 6 Personal Privacy (PP)

## Questions Received

Here is a quote from the Aquifer Exemption Draft Record of Decision, page 3 -- "The project will involve the injection of lixiviant, consisting of injection interval groundwater with added oxygen and carbon dioxide, into the uranium ore deposits targeted by 14 proposed wellfields consisting of approximately 4,000 Class III injection wells." Shouldn't there be just 84 class 3 injection wells for 14 wellfields? Where do the 4,000 fit in? Or is this a typo? Ex. 6 Personal Privacy (PP)

Could I obtain copies of the comments? Ex. 6 Personal Privacy (PP)

Which EPA program administers the injection well program? Ex. 6 Personal Privacy (PP)

I am reviewing information provided for in the 'Public Notice: Administrative Record for the Dewey-Burdock Class III and Class V Injection Well Draft Area Permits' <https://www.epa.gov/uic/administrative-record-dewey-burdock-class-iii-and-class-v-injection-well-draft-area-permits> . I'm unclear if the "Additional Administrative Record Documents", specifically, the 'Draft Cumulative Effects Analysis' are considered a component of the Class III and V draft permits and thus subject to review and comments. The statement below is copied from the website and if read literally, it could be understood to mean that comments are sought only for the Class III and V draft area permits, and the identification of traditional cultural properties...My agency would like to provide comments on both the contents of the permits and Draft Cumulative Effects Analysis. Please provide us with an explanation of the scope of EPA's request.

In addition to seeking comments on the Class III and V draft area permits, the EPA is seeking public comment on the identification of traditional cultural properties at the Dewey-Burdock Project Site Area of Potential Effects, on the potential adverse effects of the proposed project, and on measures to avoid, minimize or mitigate potential adverse effects on historic and traditional cultural properties pursuant to Section 106 of the National Historic Preservation Act and 36 CFR § 800.2(d) and § 800.6(a)(4).

The EPA is also seeking comment on two options for approval of the aquifer exemption that Powertech requested related to the Class III permit application. The two options are discussed in the Aquifer Exemption Draft Record of Decision available on the EPA Region 8 UIC Program website.

The EPA has performed an Environmental Justice (EJ) analysis for the Dewey-Burdock UIC permitting actions and is seeking comment on the Draft EJ analysis document. Ex. 6 Personal Privacy (PP)

I came to see you with my son back Dec 5, 2016 about Dewey Burdock injection well permits.

At that time, you and Douglas Minter told us that with those permits, that mining waste of the same class as the wells in question could be brought in for deposition at Dewey Burdock legally from other mines, even in other states. You also said that the permits could be sold to another company should the holder of the permits choose, or go bankrupt, as long as the waste deposited was of the same class. Please confirm the legality of that for me. Ex. 6 Personal Privacy (PP)

But are they also allowed to bring in waste from other mines or is the permit for their own wastes only? And why do they say they need two deep injection wells right away if they have no mining planned or started at this time? They have to fulfill the requirements of NRC to find and close all prior bore holes and then redo pump tests to show that the aquifers are contained. No work has been started on that and they have no funds to do so. Will you also require that? Ex. 6 Personal Privacy (PP)

I got this email and it says Powertech/Azarga is applying for 8 injection wells at the Dewey-Burdock site in South Dakota. It also says that the company can pull "in mining wastes from other regional mines and/or sell those waste disposal rights to another company later on."

Are these things true?? Ex. 6 Personal Privacy (PP)

Does this paragraph actually state that despite the comments about treating the water in the preceding paragraph that you are requesting an exemption from treating it?

What waste products are in this water? And who owns these uranium recovery mines?

"EPA is also proposing an aquifer exemption approval in connection with the draft UIC Class III Area Permit. Specifically, this approval would exempt the uranium-bearing portions of the Inyan Kara Group aquifers from protection under the Safe Drinking Water Act. Such an exemption must be in place before ISR activities within these aquifers can occur."

Thank you for answering my questions. Ex. 6 Personal Privacy (PP)

We are getting conflicting information here in the Black Hills of South Dakota, and I'm hoping you can clarify things. The topic is deep disposal wells in Fall River and Custer Counties in the general area of the Dewey-Burdock uranium mining project. I am preparing expert testimony for the draft permit process and want to be operating from accurate information. ■■■■, who met with you in December, says that you indicated that there are as many as twelve deep disposal wells planned in the general area of the Dewey-Burdock project. The recently issued draft permit for the project says that there will be two to four DDWs. Are there other projects planned that we haven't heard about here yet? Or is there some other way to account for the 8 "missing" DDWs? Ex. 6 Personal Privacy (PP)

## Comments with Technical Input

I have read the fact sheet for public comment of the two UIC Area Permits to Powertech, for injection wells for uranium recovery and aquifer exemption, for the disposal of treated ISR process waste fluids into the Minnellsusa Formation. As expected, the EPA permitting process is very thorough. At this writing, I also find myself very aware of, and thankful for, this permitting process, and more importantly, that regulatory oversight exists! It is almost secondary to this thought that I offer my public comment on the permit!

I agree with the additional pump tests in the Burdock Area wellfields targeting the Chilson sandstone, mentioned in section 3.4.2. Also that the Fuson shale confining zone may have some areas compromised by other holes punched through it, and the wellfield pump tests will pinpoint any breaches.

Providing adequate well monitoring and maintenance programs for all the wells, including the monitoring wells, will ensure well operational efficiency and extend the life of the wells throughout the project. Among other water constituents, high TDS and sulfate levels that exist in the formations, as well as the process water, will tend to clog well screens and gravel filter packs over time without vigilance. In addition to the required step tests for fracture determination discussed in section 5.9, routine pump/step tests can be useful for monitoring well efficiencies and the need to treat the wells before problems occur. The flowing artesian wells present within the area will remain a concern and should be watched.

It is my sincere hope and desire that the EPA remains intact; that regulations such as these types of permitting processes and monitoring and remediation regulations, will remain strong and continue to provide oversight of these and other operations. Without the professionalism and dedication of you and others at the EPA, our air, water, and environmental quality will suffer to an alarming degree. Thank you for all of your hard work and diligence. This citizen is appreciative of your efforts.

Ex. 6 Personal Privacy (PP)

## Comments from Tribes

RE: The EPA Region 8 Underground Injection Control Program has issued Draft permits and a proposed Aquifer Exemption Record of Decision for the Proposed Dewey-Burdock Uranium In-Situ Recovery Site

Dear Consultant:

On behalf of the Cheyenne and Arapaho Tribes, thank you for the notice of the referenced project. I have reviewed your Consultation request under section 106 of the National Historic Preservation Act regarding the project proposal and commented as follows:

At this time, it is determined to be categorized as **No Adverse Effect**; however, if at any time during the project implementation inadvertent discoveries are made that reflect evidence of human remains, ceremonial or cultural objects, historical sites such as stone rings, burial mounds, village or battlefield artifacts, please cease work in area of discovery and notify the THPO Office within 72 hours.

In addition, if inadvertent discoveries are made; pursuant to Title 36 Code of Federal Regulation Part 800.13, as amended; you will also be required to make arrangements for a professional archaeologist to visit the site of discovery and assess the potential significance of any artifacts or features that were unearthed. If needed, we will contact the Tribes NAGPRA representatives.

Please contact me at ( 405) 422-7484 or vrichey@c-a-tribes.org, if you have any questions or concerns. Alternate contact is Micah Demery; she can be reached directly at ( 405) 422-7416 or mdemery@c-a-tribes.org. Thank you again for your notification!

Best Regards,

Virginia Richey

Tribal Historic Preservation Office/THPO Officer

Cheyenne and Arapaho Tribes